6.0 ALTERNATIVES

As required by Section 15126(d) of the State CEQA Guidelines, this EIR examines a reasonable range of alternatives to the proposed Agricultural Cluster Subdivision Program that could feasibly achieve similar objectives. The discussion focuses on alternatives that may be able to reduce some of the adverse impacts associated with the proposed ordinance revisions, while still meeting the identified objectives of the program. In addition, the Alternatives discussion provides the decision makers and the public with a range of options that can be considered along with the proposed project.

6.0.1 Regulatory Considerations

State CEQA Guidelines. EIRs are required to include a reasonable range of alternatives. The requirements pertaining to an EIR alternatives analysis are identified in Section 15126.6 of the State CEQA Guidelines. An EIR must consider a "reasonable range of alternatives" which:

- *Could feasibly accomplish most of the basic objectives of the program; and*
- *Could avoid or substantially lessen one or more of the significant effects of the program.*

Additionally, an EIR alternatives analysis must include the following components:

- Explanation as to the lead agency's rationale in choice of alternatives to be evaluated, which is included in Sections 6.0.2 (page 6-2) through 6.0.4 (page 6-5).
- Evaluation of each proposed alternative in comparison to the proposed program, which is included in Sections 6.0 (page 6-9) through Section 6.5 (page 6-62~~60~~).
- A matrix displaying major characteristics of each alternative, which is included in Table 6.0-1 (page 6-8).
- A matrix summarizing a comparison of significant effects between the program and each alternative, which is included in Table 6.6-2 (page 6-~~70~~72).
- Consideration of a "no project" alternative, which is included in Section 6.0 (page 6-9).

The Agricultural Cluster Subdivision Program will take effect as a countywide policy, implemented at a programmatic level. While this EIR does forecast reasonably foreseeable impacts of build-out, impacts from separate agricultural cluster subdivision projects on individual sites are not considered in this document.

Nonetheless, to accomplish the goal of considering alternative development locations, this EIR does consider modification to the locations where the program would take effect. *Alternative 2* evaluates limiting the Agricultural Cluster Subdivision Program to locations within two miles of the identified URLs in the inland portion of the county and establishing a URL distance limitation in the Coastal Zone. As a result, *Alternatives 2* would consider modifying the locations in the county where agricultural cluster subdivisions could occur.

Meaningful Detail. State CEQA Guidelines Section 15126.6(d) states that the EIR "shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project." The level of detail must be sufficient to achieve the purpose of allowing decision makers to evaluate the environmental implications of the program when considered against a reasonable range of alternatives. Identification of alternatives is not sufficient. In *Laurel Heights Improvement Association v. The Regents of the University of California* (1988), the Supreme Court concluded that an agency must not only identify, but *discuss*, the alternatives in such a way as to "enable [the public] to understand, evaluate, and respond." (*Laurel Heights v. UC Regents,* 1988). The Supreme Court further stated that the discussion should "contain *facts and analysis*, not just the agency's bare conclusions or opinions."

Due to the diversity of projects and programs that are considered under CEQA, no specific thresholds have been set to determine whether the level of detail is sufficient. In *Al Larson Boat Shop v. Board of Harbor Commissioners* (1993), the Court of Appeals stated that the degree of specificity in alternative analyses will relate to the degree of specificity of the project or program being considered. As such, "an EIR for the adoption of a general plan… must focus on secondary effects of adoption, but need not be as precise as an EIR on the specific projects which might follow." Because the Agricultural Cluster Subdivision Program is a policy program affecting development throughout the County, the alternatives evaluated are also considered at a programmatic scale.

6.0.2 Identification of Alternatives

The alternatives selected for inclusion in this document were derived from alternatives identified during the public scoping meeting held before the Planning Commission on February 11, 2010. Additionally, a range of alternatives were identified by the project team. Each of the proposed alternatives was evaluated for consistency with the regulatory criteria (*Section 15126.6 of the State CEQA Guidelines*) and relevant case law. Some of the proposed alternatives were excluded from consideration, because they would either fail to feasibly accomplish the stated project objectives or they would not be anticipated to reduce the identified significant environmental effects.

a. Requirements – As discussed above in Section 6.0.1, an EIR must consider a reasonable range of alternatives evaluated with a meaningful level of detail. The analysis must include a "no project" alternative. For the purposes of this project, four additional alternatives are being considered. *Alternative 2* considers variation on the locations affected by the proposed program boundaries. *Alternatives 3* through *5* consider variations on certain elements of the program which accomplish most of the objectives while potentially lessening impacts. These four alternatives provide a "reasonable range."

b. Objective – The principal objective of the Agricultural Cluster Subdivision Program is to reduce environmental impacts associated with agricultural cluster subdivisions and protect lands for continued and enhanced agricultural production. More specifically, the program should:

- **Improve access to existing infrastructure and services.** Locate agricultural cluster subdivisions in closer proximity to existing infrastructure and services.

- **Implement Strategic Growth policies.** Align the agricultural cluster ordinance standards with the County's adopted Strategic Growth policies of the County Land Use Element, which encourage development to be located within existing urban areas with adequate infrastructure and resources to accommodate future population growth.

- **Introduce program to the Coastal Zone.** Introduce the agricultural cluster subdivision program to the Coastal Zone to allow the reconfiguration of existing legal underlying lots into residential cluster parcels.

- **Accommodate cluster development.** Accommodate agricultural cluster subdivisions through clustering of small, self-sustaining parcels near existing infrastructure and away from remote agricultural lands.

- **Avoid creation of new land use conflicts.** Minimize land use conflicts between residential development and existing and future agricultural operations.

- **Continue agricultural cluster opportunities.** Continue to provide opportunities for cluster subdivisions throughout portions of the County's Agriculture land use category.

- **Protect important farmland.** Reduce the amount of important farmland potentially converted to residential and non-agricultural uses in the Agriculture land use category.

c. Reduction of Environmental Impacts – Section 6.6 of this document compares and contrasts each alternative against the proposed Agricultural Cluster Subdivision Program. Table 6.6-2 summarizes how each alternative will change the severity of impacts in each issue area. Alternatives 2(a) would reduce overall environmental impacts. Therefore this alternative is considered "environmentally superior" to the Proposed Project.

d. Alternative Locations – Because the Agricultural Cluster Subdivision Program will affect a large number of parcels countywide, evaluation of individual project sites is not considered under this EIR. Similarly, the alternatives analysis is conducted at a programmatic scale considering application of the policy within five road miles of URLs on Agriculture-designated lands, countywide. *Alternatives 2* considers locating agricultural cluster subdivisions in closer proximity to existing communities to accomplish the goal of considering locational alternatives.

6.0.3 Selected Alternatives

The alternatives considered under this analysis include the following:

- **Alternative 1: No Project Alternative.** This alternative assumes that the proposed Agricultural Cluster Subdivision Program is not implemented. This means that

agricultural cluster subdivisions may still proceed in accordance with existing County policies and ordinance standards.

- **Alternative 2: Change in Locational Criteria.** This alternative assumes that the proposed Agricultural Cluster Subdivision Program will be implemented as proposed; however, this alternative also assumes that the locational criteria for agricultural cluster subdivisions would be modified. This alternative presents two options for applying locational criteria to the Inland portion of the project area and one option for the Coastal Zone. This alternative was set up with options to provide additional locational criteria in the Inland portion of the project area and to introduce locational criteria to the Coastal Zone. Each of these sub-alternatives can stand alone, but only one of the two Inland options can be selected.

    - **Alternative 2(a): Two Road Miles (Inland).** Agricultural cluster subdivisions may be allowable within two road miles of identified URLs, rather than five *road* miles.

    - **Alternative 2(b): Two Straight Miles (Inland).** Agricultural cluster subdivisions may be allowable within two *straight* miles of identified URLs, rather than five *road* miles.

    - **Alternative 2(c): Establish Locational Criteria in the Coastal Zone.** Agricultural cluster subdivisions in the Coastal Zone would be restricted to locations within two road mile of the following URLs: Cambria, Cayucos, Morro Bay, and Los Osos.

- **Alternative 3: Reducing Residential Parcel Size.** This alternative assumes that the proposed Agricultural Cluster Subdivision Program will be implemented as proposed; however, this alternative also assumes that residential parcel sizes can be reduced down to 10,000 square feet in the inland area where a community water system is provided.

- **Alternative 4: Reducing Residential Density on Existing Agricultural Parcels.** This alternative assumes that the proposed Agricultural Cluster Subdivision Program will be implemented as proposed; however, this alternative also assumes that Agriculture Element Policy 5 and Section 22.30.480 of the Land Use Ordinance would be modified to allow only one, rather than two, single family residences per existing parcel in the Agriculture land use category. Provisions allowing additional residences to be constructed as farm support quarters would remain unchanged.

- **Alternative 5: Basing Density on Underlying Parcels in the Inland Portion of the County.** This alternative assumes that the proposed Agricultural Cluster Subdivision Program will be implemented as proposed; however, this alternative also assumes that the number of residential parcels that can be created would be equal to the number of underlying parcels (inland portion of the County). Under this alternative, the program to be established in the inland portion of the County would use the same base density methodology as the program proposed for the Coastal Zone. Under this alternative, no

new parcels could be created, but existing parcels could be reconfigured to accommodate residential development.

Each alternative is respectively evaluated in Sections 6.0 through 6.5. The environmentally superior alternative is addressed in Section 6.6. The individual project elements that are included with each alternative are summarized in Table 6.0-1.

6.0.4 Alternatives Considered but Rejected

Pursuant to Section 15126.6 of the State CEQA Guidelines, an alternative may be rejected if it:

- *Would fail to feasibly accomplish most of the basic objectives of the program; or*
- *Would not avoid or substantially lessen any of the significant effects of the program.*

The following alternatives were considered for evaluation, but were rejected for one or more of the above-stated reasons:

a. Establishing a Land Banking Program

This alternative would require that the County initiate a land banking program, wherein conservation easements are purchased by the County to actively protect agricultural land. Individual development projects which would result in impacts to agricultural resources could offset those impacts by contributing to the land bank. New funds would be used to purchase additional conservation easements. This would result in the incremental protection of agricultural land.

Under this alternative the Agricultural Cluster Subdivision Program would not be implemented and agricultural cluster subdivisions could continue to be processed and approved under existing ordinances and policies.

Accomplishment of Objectives. This alternative would theoretically achieve the project objectives; however, achieving these objectives through this alternative would be infeasible for economic and regulatory reasons. Economically, it is unknown what the start-up costs and long-term costs of running a land-banking program would be. Given the present economic condition, undertaking new costly programs would not be considered feasible. Similar programs in other counties (e.g. Sonoma and Marin) have been established through the creation of an open space district and a special sales tax. Duplicating this effort in this county would require that the voters approve establishment of a new special district and a special tax to fund the district. Assuming that the voters would choose to establish a new district and increase taxes to fund that district would be speculative.

Reduction of Significant Effects. It is unknown whether this alternative would reduce environmental effects. While inherent in the establishment of "banked" lands would be the protection of these properties, too many variables exist to determine if there would actually be a reduction of significant effects. These include the timing, location and ratio of "banked" properties to allowed development. This alternative would allow agricultural cluster subdivisions to proceed under existing regulations, similar to the "no project" alternative

(Alternative 1). Alternative 1 was identified as actually increasing the number and severity of significant effects (refer to Section 6.1). No evidence in the record indicates that this alternative would reduce significant effects.

Rationale for Rejection. This alternative was rejected because establishing a land banking program is considered infeasible at this time. The infeasibility is related to economic (e.g. funding) and regulatory (e.g. required election) burdens. State CEQA Guidelines Section 15126.6(f)(3) states that an EIR need not consider an alternative whose implementation is remote and speculative. Additionally, it is undetermined if this alternative would actually reduce the significant effects identified with the Proposed Project.

b. Capping the Number of Residential Cluster Parcels

This alternative would establish the Agricultural Cluster Subdivision Program as proposed; however, it would also set an arbitrary cap on the number of residential cluster parcels that could be created with any individual agricultural cluster subdivision. The "cap" has not been specifically determined, although suggestions included a cap of 5, 10, or 20 residential parcels per subdivision. The cap would not affect standard agricultural subdivisions and would apply to each cluster subdivision proposal regardless of acreage.

Accomplishment of Objectives. This alternative would generally accomplish the identified project objectives.

Reduction of Significant Effects. It is unknown if setting an arbitrary cap on the number of parcels that could be created through an agricultural cluster subdivision would reduce environmental impacts. Under the Proposed Project, a maximum of 418 new residences could be developed under the Proposed Project throughout the inland portion of the county. If a cap were to be set, it is entirely possible that full development could occur without ever reaching the cap. No evidence has been identified to suggest that capping the number of parcels that could be created would reduce any of the significant effects identified under the Proposed Project.

The ability of this alternative to reduce environmental impacts is further called into question when considering the likelihood of regulatory loopholes. For example, a property owner could pursue multiple sequential subdivisions of the same property in an attempt to bypass the cap altogether. As such, it is unforeseeable whether establishing an arbitrary cap on the number of parcels will alter the environmental effect of the project.

Rationale for Rejection. This alternative was rejected, because there is no evidence to suggest that this alternative would reduce any of the significant effects identified in relation to the Proposed Project.

c. Extending the Program to Locations within Five *Straight* Miles of identified URLs

This alternative would establish the Agricultural Cluster Subdivision Program as proposed; however, it would also extend the program to allow agricultural cluster subdivisions to occur in locations within five *straight* miles of identified URLs, rather than five *road* miles. In doing so,

this alternative would apply the existing distance requirement for major clusters to all agricultural cluster subdivisions.

Accomplishment of Objectives. Since this alternative would retain a URL distance limitation for cluster projects and all of the restrictive provisions of the proposed program, it would generally accomplish the identified project objectives. When compared to the Proposed Project, however, this alternative would increase cluster development in rural and agricultural areas of the county and further from existing infrastructure and services.

Reduction of Significant Effects. When compared to the existing ordinance, this alternative would be anticipated to reduce significant environmental effects because it would strengthen review criteria for agricultural cluster subdivisions, eliminate the density bonus, and limit cluster projects to within a specified distance from identified URLs. The purpose of an alternatives analysis, however, is to identify alternatives that would reduce the identified significant effects of the Proposed Project. Since this alternative would allow agricultural cluster subdivisions to be developed in locations further away from existing urban areas, when compared to the Proposed Project, it would be anticipated to have greater environmental effects in virtually all subject areas.

Rationale for Rejection. This alternative was rejected because it would not reduce any of the significant environmental effects of the Proposed Project. In fact, by allowing cluster projects to occur further from the identified URLs, this alternative would be anticipated to exacerbate the adverse environmental effects of the Proposed Project.

d. Eliminating the Program

This alternative would assume elimination of existing General Plan policies and ordinance standards allowing agricultural cluster subdivisions. Under this alternative, agricultural lands may only be subdivided based on existing standard subdivision requirements.

Accomplishment of Objectives. The objectives of the proposed program assume the continuation of agricultural clustering standards in one form or another. This alternative would not meet these objectives since it would eliminate agricultural clustering standards altogether.

Reduction of Significant Effects. This alternative would reduce impacts in some issue areas and increase impacts in others. Land use compatibility and visual impacts associated with the introduction of rural residential lot patterns into agricultural areas of the county could be avoided under this alternative. However, conventional subdivisions would not be required, by ordinance, to permanently preserve agricultural land or to limit residential development to five percent of the overall property. As a result, this alternative could increase impacts on agricultural soils and biological resources.

Rationale for Rejection. This alternative was rejected because it would not accomplish the project objectives. Additionally, it is undetermined if this alternative would actually reduce the significant effects identified with the proposed program.

Table 6.0-1: Alternative Program Components

Program Components	**Proposed Project**	**Alternative 1:** No Project	**Alternative 2(a):** Two Road Miles (Inland)	**Alternative 2(b):** Two Straight Miles (Inland)	**Alternative 2(c):** Locational Criteria in CZ	**Alternative 3:** Reducing Res. Parcel Size	**Alternative 4:** Reducing Residential Density	**Alternative 5:** Underlying Parcels
INLAND								
Eliminate the distinction between major and minor clusters	●		●	●	●	●	●	●
Eliminate agricultural cluster subdivision as an option in Rural Lands	●		●	●	●	●	●	●
Allow agricultural cluster subdivisions only:								
Within 5 road miles of URL	●					●	●	●
Within 2 road miles of URL			●		●			
Within 2 straight miles of URL				●				
Eliminate the density bonus	●		●	●	●	●	●	●
Increase the minimum cluster parcel size	●		●	●	●		●	●
Add design standards to cluster subdivisions: Physically contiguous cluster lots Single cluster area (or up to two) Count infrastructure towards 5% area	●		●	●	●	●	●	●
Add application requirements	●		●	●	●	●	●	●
Clarify agricultural buffer requirements	●		●	●	●	●	●	●
Update section references	●		●	●	●	●	●	●
Reduce residential density to 1 house per lot							●	
Existing ordinance/policies governing agricultural cluster subdivisions remain unchanged		●						
Density based on minimum parcel size for the Agriculture land use category, using the “use” or “capability” test		●						
Density based on minimum parcel size for the Agriculture land use category, using the “use” test only	●		●	●	●	●	●	●
Density to be based on underlying lots					●			●
COASTAL								
Introduce program to the Coastal Zone	●		●	●	●	●	●	●
Density to be based on underlying lots	●		●	●	●	●	●	●
Agricultural viability report required	●		●	●	●	●	●	●
Cluster required for lot line adjustments	●		●	●	●	●	●	●
Allow agricultural clusters on all agricultural land	●		●	●		●	●	●
Allow agricultural clusters on agricultural lands within two road miles of identified URLs					●			

6.1 ALTERNATIVE 1: NO PROJECT

Description

State CEQA Guidelines Section 15126.6 requires that an Environmental Impact Report's alternatives analysis consider a "no project" alternative. A "no project" alternative considers maintaining the status quo. This alternative anticipates that existing policies governing rural subdivisions would remain in place unchanged.

> *The purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving the Proposed Project with the impacts of not approving the Proposed Project. The no project alternative analysis is not the baseline for determining whether the Proposed Project's environmental effects may be significant, unless it is identical to the existing environmental setting analysis, which does establish that baseline.*

When the project consists of the adoption of a new plan or policy, State CEQA Guidelines Section 15126.6(e)(3)(A) states that the no project alternative must consider "the continuation of the existing plan, policy, or operation into the future." The California Court of Appeal clarifies that the no project alternative analysis "[assists] the decision maker and the public in ascertaining the environmental consequences of doing nothing." As such, the "no project" alternative is not a "no development" alternative. This alternative does not consider elimination of the existing agricultural cluster subdivision program. Rather, that scenario was considered but eliminated since it would not meet the project objectives. This alternative considers continuation of existing policies governing agricultural cluster subdivisions and reasonably foreseeable development that could occur under existing regulations.

Existing Conditions

Existing conditions which affect residential development on rural agricultural land are summarized as follows:

- **Each standard parcel designated Agriculture is entitled to build two primary residential units.** Agriculture Element Policy 5 and Section 22.30.480 govern residential density on existing parcels. Additional residential units may qualify as farm support quarters commensurate to the agricultural use on the site. Historic trends demonstrate that only 8 percent of existing standard parcels have been developed with 2 primary residences.

- **Standard subdivisions could result in parcels as small as 20 acres.** New subdivisions of agricultural land may result in parcels of 20 acres, provided that there are at least 18 acres of intensively farmed area on each parcel and soils are prime. In circumstances where parcels are created under this provision, only one residence may be built per parcel.

- **Subdivision minimum parcel size is determined based on application of a use or soils and capability test.** Land may qualify for subdivision to parcel sizes as low as 40 acres based on historical use. Intensively farmed land qualifies for lower minimum parcel sizes, because intensive farm activities tend to be viable on smaller parcels compared to less intensive uses such as livestock grazing. Land may also qualify for subdivision to parcel sizes as low as 40 acres based on capability. The more capable lands would have soils rated Class I to IV and a sufficient water supply to irrigate for intensive farming. Less capable lands requiring larger parcel sizes would have poorer soils and/or insufficient irrigation capability. In the best conditions where intensive farming has historically occurred on prime soils, subdivision to 20 acre parcels is possible.

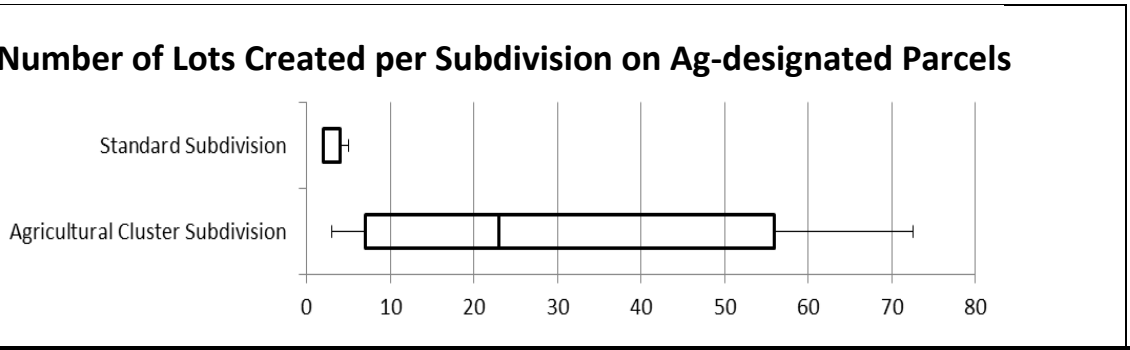
- **Owners of Agriculture and Rural Lands designated parcels may subdivide either through the standard subdivision process or through the agricultural cluster subdivision program.** Existing agricultural cluster subdivision policies and standards are set through Agriculture Element Policies 22 and 23, and through Section 22.22.150 through 22.22.154 of the Land Use Ordinance. Major agricultural cluster subdivisions allow a 100 percent density bonus, essentially equating the number of residential cluster parcels with the potential number of primary residences that could be generated through a standard subdivision (assuming 100 percent of standard parcels would be developed with two primary residences). Minor agricultural cluster subdivisions qualify for a 25 percent density bonus. In exchange for these incentives, a large amount of land is to be protected in perpetuity as open space (90 percent for minor, 95 percent for major).

- **Based on historic trends, a greater number of new residences are generated through agricultural cluster subdivisions than through standard subdivisions.** Over the last ten years, roughly 73 percent of new Agriculture-designated parcels were created as part of an agricultural cluster subdivision. As depicted in Figure 6.1-1, the median number of parcels created as part of an agricultural cluster subdivision (23) is roughly 11 times greater than the median number of parcels created as part of a standard agricultural subdivision (2). Furthermore, residential build-out on agricultural cluster parcels tends to be close to 100 percent of the maximum build-out. In contrast, residential build-out on standard parcels tends to be closer to 54 percent[1]

- **Agricultural cluster subdivisions are not allowed in the Coastal Zone.** There are no provisions in the Local Coastal Program or Coastal Zone Land Use Ordinance to allow agricultural cluster subdivisions within the Coastal Zone.

[1]Based on the historic trend that second primary residences are constructed on only about 8 percent of standard agricultural parcels.

Figure 6.1-1: Whisker Plot Comparison between Standard and Cluster Subdivisions



Subdivision Type	Mean	Min	Q1	Median	Q3	Max
Standard Subdivision	3.3	2	2	2	4	14
Agricultural Cluster Subdivision	38.5	3	7	23	56	112

Source: County Department of Planning and Building Permit Tacking Database

Contrast in Policies between the Project and the No Project Alternative

In the case of agricultural cluster subdivisions, the existing policies which would be carried forward under a no-project alternative include, but are not limited to the following:

Inland Areas

- **Minor cluster option will remain.** This alternative would not eliminate the minor cluster subdivision option. Under the present ordinance, minor clusters may occur on most agricultural lands throughout the County. There is no limitation on distance from an urban reserve line. Minor clusters allow development on 10 percent of the site area, and require the remaining 90 percent area to be placed within an open space easement. A 25 percent bonus density is awarded for minor agricultural cluster subdivisions.

- **Agricultural cluster subdivisions may occur in Rural Lands.** This alternative would allow agricultural cluster subdivisions to occur within the Rural Lands land use category.

- **Major cluster density bonus will remain.** This alternative would maintain the 100 percent density bonus allowed for major agricultural clusters located within 5 miles of identified urban reserve line.

- **Smaller cluster parcels will be allowable.** Residential cluster parcels are allowed down to a size of 10,000 square feet under the present ordinance. Parcel sizes are, however, constrained by the need to accommodate sufficient agricultural buffers. Parcels sized less than 2.5 acres would be required to be served by a community water system.

- **Design standards remain unchanged.** Clarified design requirements (e.g. contiguity, counting roads and infrastructure towards developable areas, etc.) would not be

provided under this alternative. Application of these design standards, however, may still occur as part of the discretionary review process.

- **Agricultural cluster subdivisions may qualify on capability.** Under the existing ordinance, the applicant may choose which subdivision test is applied to determine minimum parcel size – the *use test*, which considers existing and historic agricultural use; or the *soils capability test*, which considers the potential for future agricultural production as determined by soil quality. Under this alternative, the applicant could continue to choose which subdivision test to use in order to determine base density. Additionally, compliance with standard subdivision requirements aimed at ensuring the creation of sustainable parcels would continue to be presumed rather than demonstrated. This presumption would continue to result in the creation of a greater number of residential parcels in agricultural areas.

- **New application materials will not necessarily be required.** Under this alternative, existing application content requirements will remain in place. Newly proposed application contents (e.g. hydrogeologic analysis) will not be statutorily required. Historically, the County has, however, required these application contents in order to process individual projects pursuant to CEQA. As such, under this alternative, whether these materials will be necessary will remain at the discretion of the Environmental Coordinator.

- **Agricultural buffer requirements will remain the same.** At present, agricultural buffers are governed under the Board-adopted Agricultural Buffer Policy (November 2005). This existing policy clearly states that agricultural buffers are to be accommodated on the developer's land. The policy further states that the County does not have authority to restrict agricultural practices on agricultural land in order to accommodate the buffer. The clarifying language proposed as part of the project mirrors this existing policy. As there is no change proposed to the buffer policy, this alternative will not substantially differ from the proposed program.

- **Standard subdivisions could continue to occur with no change.** Existing ordinance standards governing standard agricultural subdivisions would remain in place unchanged. In this respect, this alternative will not differ from the proposed program.

- **Density on existing parcels would not be affected.** Agricultural parcels over 20 acres in the Inland portion of the County would continue to be allowed up to two single family residences, plus qualifying farm support residences. In this respect, this alternative will not differ from the proposed program.

Coastal Zone

- **No cluster option in the Coastal Zone.** This alternative would not introduce the agricultural cluster subdivision option for agricultural lands in the Coastal Zone. Subdivision of agricultural properties within the Coastal Zone could still occur as a standard subdivision.

- **Lot Line Adjustments of Agriculture-designated land need not be done as a cluster subdivision.** Under the present ordinance standards, lot line adjustments affecting four or fewer parcels of Agriculture-designated land may occur provided that the adjustment will result in a better or equal situation relative to the General Plan and ordinances. This means that such lot line adjustments need not create clustered non-agricultural parcels[2].

Change in Number of Units

State CEQA Guidelines Section 15126.6(e) requires that the no project alternative consider a level of foreseeable future development based on existing policies. In order to perform this analysis, a foreseeable level of development is predicted considering historic development trends and the differences in policy. Comparing Alternative 1 with the proposal, the following changes are anticipated to the number of potential residential units at build-out:

- **Coastal Zone: No change.** Within the Coastal Zone there is not anticipated to be a change in the number of residential units constructed at build-out, when contrasting the proposed program with this alternative. In both cases, the number of residential units that could be developed on agricultural land is based on the number of existing underlying parcels. In both cases, standard subdivisions could be pursued based on the subdivision tests in the Coastal Zone Land Use Ordinance.

- **Inland Areas: Between 0 and 1,146 additional residences.** Within inland areas, anticipated residential build-out will depend on whether an owner chooses to subdivide using a standard subdivision or an agricultural cluster subdivision. As making this assumption would be speculative, three scenarios were considered in order to provide a reasonable range:

    - **Scenario 1: Full Cluster Build-out, 1,030 additional residences.** Under this scenario, all parcels which would qualify for an agricultural cluster subdivision would be subdivided to the maximum extent under that program. Remaining land would be subdivided to the maximum extent under the standard subdivision procedures. This scenario anticipates 1,030 additional residences under Alternative 1, when compared to the project.

    - **Scenario 2: Full Standard Build-out, no additional residences.** Under this scenario, all affected parcels would be subdivided to the maximum extent under the standard subdivision procedures. As standard subdivision procedures would not be affected by the Proposed Project, there is no difference between the project and Alternative 1.

[2] Recently, the Coastal Commission has been asserting that lot line adjustments involving smaller non-agricultural parcels are required to cluster the non-agricultural uses to the maximum extent feasible. This would be necessary in order to avoid inconsistency with the Coastal Plan Policies pertaining to Agriculture (Coastal Commission, November 18, 2010 staff report for Appeal A-3-SLO-10-028). As such, it appears that, under the Commission's discretion, the "no project" alternative may be similar to the proposed requirement that lot line adjustments be processed as cluster subdivisions.

- **Scenario 3: Likely Cluster Build-out, 1,146 additional residences.** Under this scenario, roughly 65 percent of full cluster build-out is achieved. The remaining 35 percent of qualifying land, as well as all land beyond the five mile urban reserve line limitation, would be subdivided using the standard subdivision procedures. This scenario assumes use of the agricultural cluster subdivision program for rural subdivisions would continue based on the historic trends[3]. This scenario further assumes that owners of parcels made ineligible for a cluster subdivision will instead pursue standard subdivisions to the maximum extent. An additional 1,146 residences would be anticipated under Alternative 1 when compared to the project under this scenario.

Table 6.1-1: Subdivision and Development Potential under Alternative 1

Scenario	Feature	Project	Alternative 1	Change
Scenario 1: 100 % Cluster Subdivisions	Cluster Parcels/Residences	418	4,582	
	Standard Parcels	2,902	0	
	Standard Residences[4]	3,134	0	
	Total Residences	3,552	4,582	+ 1,030 SFRs
Scenario 2: 100 % Standard Subdivisions	Cluster Parcels/Residences	0	0	
	Standard Parcels	3,320	3,320	
	Standard Residences	3,586	3,586	
	Total Residences	3,586	3,586	Equal
Scenario 3: Likely Build-out (65% Cluster / 35% Standard)	Cluster Parcels/Residences	272	2,978	
	Standard Parcels	3,048	1,604	
	Standard Residences	3,292	1,732	
	Total Residences	3,564	4,710	+ 1,146 SFRs

Source: San Luis Obispo Department of Planning and Building

Change in Dispersal of Units

Compared to the Proposed Project, Alternative 1 would result in the following:

- **Increased residential density in rural areas.** This conclusion is reached, because Alternative 1 would make a far greater amount of acreage eligible for agricultural cluster subdivision. Agricultural cluster subdivisions have historically been built out at a greater density than standard agricultural subdivisions. Additionally, Alternative 1 would maintain density bonuses and low minimum parcel sizes, which enables more residences to be placed within the five percent developable area.

- **Potentially less contiguous clustering of residences.** Contiguity of the residential cluster parcels will not be a statutory requirement under Alternative 1. Therefore,

[3] Over the last ten years, roughly 27 percent of new Agriculture-designated parcels were created through standard subdivision; roughly 73 percent of new Agriculture-designated parcels were created through cluster subdivisions.
[4] Calculations for standard residences assume continuation of the historic trend that roughly 8 percent of Agriculture-designated parcels have a second primary residential unit.

residential development could potentially continue to occur in less contiguous patterns. The open areas between residential cluster parcels would effectively be removed from agricultural production.

- **Potentially less dispersion of residences.** Under Alternative 1, minimum parcel sizes for cluster parcels will continue to be as low as 10,000 square feet. As a result, the residences within an agricultural cluster subdivision could be located closer together.

Achievement of Objectives

The objectives identified for the proposed Agricultural Cluster Subdivision Program largely center on modifying the existing program. As the "no project" alternative considers a scenario where existing policies are carried forward, the alternative by its nature is inconsistent with the objectives. This alternative is nonetheless being considered in order to comply with Section 15126.6 of the State CEQA Guidelines.

6.1.1 Impact Analysis

Substantial Change

The following impacts are anticipated to be substantially different when contrasting Alternative 1 and the Proposed Project:

Agricultural Resources. The no project alternative would allow agricultural cluster subdivisions to continue occurring throughout the inland portion of the County on Agriculture and Rural Lands designated land. Agricultural cluster subdivisions are a preferred means for residential development of agricultural land, as they create a small marketable parcel and still allow a majority of the land to be retained for farming. Over the last ten years, roughly 73 percent of new parcels created on land designated Agriculture have been created as part of an agricultural cluster subdivision (refer to Figure 6.1-1). Compared to the Proposed Project, the "no project" alternative would therefore change impacts related to agricultural resources as follows:

- **Increase in non-agricultural development on important farmland [AG-1], exacerbating a significant and unavoidable impact.** This alternative would allow additional and more dispersed residential development to occur on agricultural land when compared with the Proposed Project. As a result, a greater number of residences could be developed in areas with important farmland mapped by the State Department of Conservation. This alternative does not include restrictive provisions limiting development on important farmlands. Impacts to important farmland are therefore anticipated to increase under this alternative.

- **Increase in urban and agricultural land use conflicts [AG-3].** This alternative would allow additional and more dispersed residential development to occur on agricultural lands when compared with the Proposed Project. As a result, this alternative would

increase the overall amount of interface between residential and agricultural uses and would therefore increase the potential for urban and agricultural land use conflicts.

- **Reduced consistency with Agriculture Element (AE) and Conservation and Open Space Element (COSE) policies concerning the preservation of agricultural lands [AG-4].** This alternative would allow additional and more dispersed residential development to occur on agricultural land when compared with the Proposed Project. This Alternative does not include restrictive provisions ensuring the protection of agricultural resources. It is therefore anticipated to reduce consistency with the following AE and COSE policies:

    - AE Policy 17: Agricultural buffers – Alternative 1 would reduce consistency with this policy since it would allow for residential cluster parcels as small as 10,000 square feet, which could be too small to accommodate the required agricultural buffers. Additionally, this alternative does not include provisions clarifying existing agricultural buffer policies. As a result, agricultural buffers could be placed on the agricultural parcel, rather than on individual residential cluster parcels. This could have the effect of burdening agriculturalists, rather than developers and homeowners, with the responsibility of establishing and maintaining the buffer area.

    - AE Policy 18 and COSE Policy SL 3.1: Protection of agricultural land – This alternative would allow the continuation of existing policies governing agricultural cluster subdivisions. If properly designed (with physically contiguous cluster parcels, adequate agricultural buffers, etc.) individual cluster projects reviewed under the existing ordinance are able to comply with Agriculture Element and COSE policies intended to protect agricultural land. When compared to the Proposed Project, however, Alternative 1 reduces consistency with these policies since it would allow for additional residential development, resulting in the direct conversion of a greater amount of agricultural land. Additionally, this alternative would not include proposed language to clarify that all non-agricultural infrastructure associated with an agricultural cluster subdivision is to be included in the five percent developable area. Further, under this alternative, contiguity of the residential cluster parcels will not be a statutory requirement. Therefore, residential development could potentially continue to occur in less contiguous patterns. As a result, the open areas between residential cluster parcels would effectively be removed from agricultural production.

Air Quality. This alternative would allow additional residential development to occur in rural/agricultural areas and further from existing communities when compared with the Proposed Project. Impacts related to air quality would therefore change as follows:

- **Increase in construction-phase emissions [AQ-1] and operational-phase emissions [AQ-2], exacerbating a significant and unavoidable impact.** Under this alternative, a greater number of residences could be developed in the rural areas. Construction-

related (e.g. particulate matter, nitrous oxides, etc.) and operational (ozone precursors, fugitive particular matter, and carbon monoxide) emissions would therefore be anticipated to increase under this alternative. Significant and unavoidable impacts related to operational-phase emissions would be exacerbated under this alternative.

- **Reduced consistency with the Clean Air Plan [AQ-3].** This alternative will allow additional residential development to occur on agricultural land when compared with the Proposed Project. In contrast, Clean Air Plan policies and strategies are designed to focus new residential development within existing communities. Focusing growth towards urban areas facilitates reductions in vehicle miles traveled and increased use of public transit, thereby reducing vehicle emissions. As this alternative would allow additional residential development to occur in rural areas, it would improve consistency with the Clean Air Plan.

Biological Resources. This alternative would allow additional residential development to occur in rural/agricultural areas and further from existing communities when compared with the Proposed Project. As a result, a greater amount of land could be graded for the construction of new residences and associated infrastructure (e.g. new roads, utility lines, etc.). Impacts related to biological resources would therefore change as follows:

- **Increased impacts to sensitive habitats [BR-1], special status species [BR-2], and wildlife movement corridors [BR-3], potentially raising this impact to a significant and unavoidable level.** Under this alternative, more residences and associated infrastructure (roads, utilities, etc.) could be developed within and/or adjacent to areas containing sensitive habitat, special status species, and wildlife movement corridors. Moreover, agricultural cluster subdivisions would not be subject to the proposed standard clarifying that cluster parcels must be physically contiguous to each other. As a result, residential development associated with individual cluster subdivisions would be more likely to lead to the fragmentation of oak woodlands and other sensitive habitat areas. Therefore, under Alternative 1, this impact would be anticipated to increase from a Class II, *significant but mitigable*, impact to a Class I, *significant and unavoidable*, impact.

Cultural Resources. This alternative would allow additional residential development to occur in rural/agricultural areas and further from existing communities when compared with the Proposed Project. As a result, a greater amount of land would be graded for the construction of new residences and associated infrastructure (e.g. new roads, utility lines, etc.). Impacts related to cultural resources would therefore change as follows:

- **Increased impacts to historic resources [CR-1], pre-historic archaeological resources [CR-2], and paleontological resources [CR-3].** Under this alternative, more residences and associated infrastructure (roads, utilities, etc.) could be developed in areas containing important cultural resources. Impacts to cultural resources would therefore be anticipated to increase under this alternative.

Geologic Hazards. This alternative would allow additional residential development to occur in rural/agricultural areas and further from existing communities when compared with

the Proposed Project. As a result, a greater number of residences could be developed within rural/agricultural areas of the county. Compared to the Proposed Project, this alternative would therefore change impacts related to geologic hazards as follows:

- **Increased impacts resulting from residential development near fault lines [G-1], and in areas with soil hazards [G-2].** Under this alternative, a greater number of residences could be developed near active or potentially active faults and in areas with soil hazards, increasing the potential for impacts related to geologic hazards.

Greenhouse Gases. This alternative would allow additional residential development to occur in rural/agricultural areas and further from existing communities when compared with the Proposed Project. Impacts related to greenhouse gas emissions would therefore change as follows:

- **Increased greenhouse gas impacts [GHG-1], exacerbating a significant and unavoidable impact.** This alternative would allow the continuation of existing policies governing agricultural cluster subdivisions. Under these existing policies, cluster development would not be limited to locations within five miles of the identified URLs. As a result, more residences could be developed in remote areas where occupants would be required to travel extended distances to access commercial services and employment centers. Low population densities make alternative modes of transportation infeasible in these areas. Therefore, this alternative would be expected to increase vehicle miles traveled and residential development potential over the 20 year planning horizon of the program, thereby increasing greenhouse gas emissions from the combustion of fossil fuels.

Hydrology and Water Quality. This alternative would allow additional residential development to occur in rural/agricultural areas when compared with the Proposed Project. As a result, a greater amount of land would be graded for the construction of new residences and associated infrastructure (e.g. new roads, utility lines, etc.). Compared to the Proposed Project, this alternative would therefore change impacts related to hydrology and water quality as follows:

- **Increased impacts from alteration of drainage courses [HWQ-1], and alteration of drainage conditions [HWQ-2].** This alternative would increase the amount of land that could be graded for the construction of new residences and associated infrastructure (e.g. new roads, utility lines, etc.). Consequently, potential impacts related to the alteration of drainage courses ("hydromodification") and natural drainage conditions would be greater under this alternative. However, implementation of existing ordinance standards requiring drainage plan review and the mitigation measures identified in Section 4.7, Hydrology and Water Quality, would reduce these impacts to less than significant levels.

- **Increased erosion and sedimentation impacts [HWQ-3].** Potential impacts related to erosion and sedimentation would be greater under this alternative. However,

implementation of existing ordinance standards requiring erosion and sedimentation control plan review would reduce these impacts to less than significant levels.

- **Increased development in flood hazard areas [HWQ-4].** Under this alternative, a greater number of residences could be constructed in flood hazard areas. However, under both scenarios, implementation of existing ordinance standards for development in flood hazard areas (LUO Chapter 22.14 /CZLUO Chapter 23.07) would reduce impacts to a less than significant level.

- **Increased stormwater and non-stormwater pollutants [HWQ-5].** Potential impacts related to stormwater and non-stormwater pollutants would be greater under this alternative. However, implementation of existing ordinance standards requiring Stormwater Pollution Prevention Plan (SWPPP) and erosion and sedimentation control plan review would reduce these impacts to less than significant levels.

- **Reduction in pollutant discharge from agricultural operations [HWQ-6].** Under this alternative, applicants would continue to have the option to determine the base density for an agricultural cluster subdivision using the soil capability test. Therefore, compared to the Proposed Project (which only allows qualification based on the use test) there would be less incentive to intensity agricultural operations. Nonetheless, under both scenarios, this impact would be considered less than significant.

Noise. This alternative would allow additional residential development to occur in rural/agricultural areas and further from existing communities when compared with the Proposed Project. As a result, a greater number of residences could be developed in the rural areas of the county. Compared to the Proposed Project, this alternative would therefore change noise impacts as follows:

- **Increased noise impacts related to construction activities [N-1].** More construction activities would occur under this alternative, thereby increasing the potential for construction-related noise impacts. However, under both scenarios, implementation of existing ordinance standards limiting construction hours and the required noise reduction plan (Mitigation Measures N-1) would reduce this impact to a less than significant level.

- **Increased traffic noise affecting existing sensitive receptors [N-2], exacerbating a significant and unavoidable impact.** Since this alternative would increase vehicle trips on County roadways, it would also be anticipated to increase the amount of traffic noise affecting existing sensitive receptors.

- **Increased impacts on new sensitive noise receptors [N-3].** Compared to the Proposed Project, a greater number of new residences would be located along major County roadways and highways where traffic noise is anticipated to exceed maximum allowed interior and exterior noise levels pursuant to LUO Section 22.10.120 / CZLUO Section 23.06.040. Noise impacts on new sensitive receptors would therefore increase under this alternative.

Public Services and Utilities. This alternative would allow additional residential development to occur in rural/agricultural areas and further from existing communities when compared with the Proposed Project. Additionally, since this alternative does not include restrictive provisions limiting agricultural cluster subdivisions to locations within five miles of identified URLs, the residences developed under this alternative would be located further away from existing infrastructure and service centers. Compared to the Proposed Project, this alternative would therefore change impacts related to public services and utilities as follows:

- **Increased demands on the San Luis Obispo County Sherriff Department, Cal Fire, and other emergency service providers [PS-2]; parks, recreational facilities, and libraries [PS-3]; and schools [PS-4].** This alternative would increase demands placed on public safety services, parks, recreational facilities, libraries, and schools. These increased demands could necessitate the construction of new facilities in order to maintain acceptable levels of service; however, at this time, it is speculative to determine the nature of future site specific impacts that may be secondary effects of this project (*CEQA Guidelines Section 15145*).

- **Increase in impacts related to solid waste disposal [PS-6].** This alternative would increase demands placed on existing landfill capacities. However, under both scenarios, with implementation of existing ordinance requirements, this impact would be less than significant.

Traffic. This alternative would allow additional residential development to occur in rural/agricultural areas and further from existing communities when compared with the Proposed Project. Traffic impacts would therefore change as follows:

- **Increased impacts to county roadways and intersections [T-1].** When compared to the Proposed Project, this alternative would increase the number of trips and vehicle miles travelled on the County's circulation system, thereby increasing impacts on County roadways and intersections.

- **Increased potential sight distance hazards [T-2], and secondary access impacts [T-3].** This alternative would increase the potential for sight distance hazards to occur in rural/agricultural areas.

Visual Resources. This alternative would allow additional residential development to occur in rural/agricultural areas and further from existing communities when compared with the Proposed Project. Consequently, this alternative could increase cluster development and related infrastructure (e.g. new driveways) on visible steep slopes and within visually sensitive areas. This alternative would also continue to allow residences to be developed on 10,000 square-foot cluster lots. This alternative would not introduce the agricultural cluster subdivision option for agricultural lands in the Coastal Zone. Subdivision of agricultural properties within the Coastal Zone could still occur as a standard subdivision and would be subject to existing ordinance standards and Local Coastal Program policies intended to protect visual and scenic resources. Impacts are therefore anticipated to change as follows:

- **Increased impacts on scenic vistas [VR-1] and viewsheds from state scenic highways [VR-2].** This alternative would increase residential development and associated infrastructure in rural and agricultural areas of the county. As a result, the visual impacts associated with the introduction of new residential structures in rural/agricultural areas of the county would be greater under this alternative.

- **Increased impacts on the rural, agrarian character of the (inland) project area [VR-3].** This alternative would continue to allow cluster development to occur on 10,000 square-foot lots in rural/agricultural areas of the county. Although mitigation measures, such as vegetative screening, could reduce the visual impacts of individual residences, the impacts associated with the expansion of urban development patterns into rural/agricultural areas would be potentially significant. Therefore, under Alternative 1, this impact would increase from a Class II, *significant but mitigable*, impact to a Class I, *significant and unavoidable*, impact in the inland portion of the county.

- **Reduced impacts on the rural, agrarian character of the (coastal) project area [VR-3].** In the Coastal Zone, this alternative assumes the continuation of existing policies and ordinance standards which do not allow for cluster subdivisions on agricultural lands. As a result, agricultural land divisions in the Coastal Zone would be in the form of standard subdivisions. The minimum parcel size for a standard subdivision would be 20 acres or larger depending on the agricultural use or soil capability of the property. Compared to the Proposed Project, which allows 2.5-acre residential cluster parcels, this alternative would allow the continuation of subdivision and development patterns that are more consistent with the rural/agricultural character of the project area in the Coastal Zone.

- **Increased impacts caused by night lighting and glare [VR-4].** Compared to the Proposed Project, this alternative would potentially increase the number of residences that could be constructed in rural/agricultural areas, thereby increasing potential impacts related to night lighting and glare.

Water Resources. This alternative would allow additional residential development to occur in rural/agricultural areas beyond what is anticipated with the Proposed Project, thereby increasing demand on existing water supplies. Under this alternative, the ordinance would not require agricultural cluster subdivisions to include a hydrogeologic analysis to serve as verification that adequate water resources are available to service anticipated residential uses without impacting water supplies for existing and future agricultural uses. However, the Environmental Coordinator would still have the discretion to require a hydrogeologic analysis in order to complete the environmental review for individual projects under CEQA. Additionally, individual projects would be subject to discretionary review and would be reviewed by the Department of Planning and Building for consistency with Conservation and Open Space Element Policy WR 1.13, which states that new land divisions shall not be approved in rural areas with constrained water basins, unless there is an overriding public need. Impacts are therefore anticipated to change as follows:

- **Increased impacts to constrained water basins [WR-1].** This alternative could increase development potential in areas with constrained water basins. However, individual projects with the potential to impact constrained water basins, could not be approved under existing General Plan policies.

- **Reduced consistency with Agriculture Element (AE) Policy 11 and Conservation and Open Space Element (COSE) Policy WR 1.7 [WR-2].** This alternative would reduce the program's consistency with AE Policy 11 and COSE Policy 1.7 since it would increase competition for water resources between residential and agricultural uses, and would allow for small community water systems to be established on agricultural parcels.

- **Reduced impacts to reliable water service [WR-3].** Under this alternative, small community water systems would continue to be allowed to serve residential cluster parcels. These water systems could be more reliable than individual on-site wells, thereby reducing impacts related to the reliability of water service.

- **Increased impacts to water quality [WR-4].** Residential water quality could be affected by adjacent agricultural uses. For example, fertilizers used as part of agricultural operations can leach into the groundwater resulting in increased nitrate levels. In some circumstances, the nitrates, minerals, and dissolved solids could exceed drinking water standards. This alternative could increase this impact since it would increase the number of residences that could potentially be developed adjacent to agricultural operations. Nevertheless, with implementation of existing ordinance standards, this impact would remain insignificant under both scenarios.

Growth Inducing Impacts. This alternative would allow additional residential development to occur on agricultural land beyond what is anticipated with the Proposed Project. It would also allow the construction of community water and wastewater systems in rural and agricultural areas of the county. As a result, when compared to the Proposed Project, this alternative could add a greater number of residents to the county. These new residents would incrementally increase activity in retail establishments and may generate demand for such services as landscaping, gardening, home cleaning, and maintenance. However, new residents are expected to draw on existing retail and commercial services already available in the county, rather than inducing new service providers to relocate to the area. This additional development and associated increase in population would therefore be consistent with the build-out potential anticipated under the County's General Plan.

Land Use Policy Consistency. This alternative would allow additional residential development to occur on agricultural land beyond what is anticipated with the Proposed Project. As a result, a greater number of residences could be developed in rural/agricultural areas of the county. Consequently, this alternative could increase the potential for environmental impacts and land use conflicts resulting from agricultural cluster subdivisions. It would therefore be anticipated to change land use policy consistency as follows:

- **Reduced consistency with Strategic Growth policies and principles.** A key objective of the Agricultural Cluster Subdivision Program is to align agricultural cluster ordinance

standards with the Strategic Growth policies of the County Land Use Element, which discourage increased residential development outside of established communities. However, this alternative would allow the continued subdivision and development of rural/agricultural areas under the provisions of the existing agricultural cluster ordinance. Development under the existing ordinance would be located further from existing communities and would therefore be less consistent with Strategic Growth policies and principles when compared to the Proposed Project.

- **Reduced consistency with Agriculture Element (AE) and Conservation and Open Space Element (COSE) policies concerning the preservation of agricultural lands.** This alternative would allow additional and more dispersed residential development to occur on agricultural land when compared with the Proposed Project, and does not include restrictive provisions ensuring the protection of agricultural resources. Therefore, this alternative is anticipated to reduce consistency with the following AE and COSE policies:

    - AE Policy 11: Agricultural water supplies – Alternative 1 would reduce consistency with this policy since it would increase competition for water resources between residential and agricultural uses, and would allow for small community water systems to be established on agricultural parcels.

    - AE Policy 17: Agricultural buffers – Alternative 1 would reduce consistency with this policy since it would allow for residential cluster parcels as small as 10,000 square feet, which could be too small to accommodate the required agricultural buffers. Additionally, this alternative does not include provisions clarifying existing agricultural buffer policies. As a result, agricultural buffers could be placed on the agricultural parcel, rather than on individual residential cluster parcels. This could have the effect of burdening agriculturalists, rather than developers and homeowners, with the responsibility of establishing and maintaining the buffer area.

    - AE Policy 18 and COSE Policy SL 3.1: Protection of agricultural land – This alternative would allow the continuation of existing policies governing agricultural cluster subdivisions. If properly designed (with physically contiguous cluster parcels, adequate agricultural buffers, etc.) individual cluster projects reviewed under the existing ordinance are able to comply with Agriculture Element and COSE policies intended to protect agricultural land. When compared to the Proposed Project, however, Alternative 1 reduces consistency with these policies since it would allow for additional residential development, resulting in the direct conversion of a greater amount of agricultural land. Additionally, this alternative would not include proposed language to clarify that all non-agricultural infrastructure associated with an agricultural cluster subdivision is to be included in the five percent developable area. Further, under this alternative, contiguity of the residential cluster parcels will not be a statutory requirement. Therefore, residential development could potentially continue to occur in less contiguous patterns. As a result, the open

areas between residential cluster parcels would effectively be removed from agricultural production.

- **Reduced consistency with Conservation and Open Space Element policies concerning the sustainability of environmental resources.** This alternative would allow for additional residential development to occur in rural/agricultural areas, increasing potential environmental impacts in virtually all subject areas. Consequently, this alternative would be anticipated to reduce consistency with Conservation and Open Space Element policies concerning the sustainability of environmental resources.

No Substantial Change

The following impacts are not anticipated to be substantially different when contrasting Alternative 1 and the Proposed Project:

- **Impact AG-2: Conversion of prime agricultural soils.** Both the existing ordinance and the proposed amendments include a restrictive provision prohibiting the development of structures on soils with an NRCS capability classification of I or II ("prime soils"). Therefore, under both the proposed project and the "no project" alternative, new development would not be anticipated to occur on prime agricultural soils.

- **Impact N-4: Noise from agricultural operations.** Under this alternative, agricultural properties could qualify for cluster subdivisions using the "soil capability" test (rather than the "use" test only). As a result, when compared to the Proposed Project, this alternative could allow for agricultural cluster subdivisions to occur in areas that are farmed less intensively. On the other hand, this alternative would also increase overall development potential in agricultural areas. Impacts related to agricultural noise are therefore anticipated to be similar under the Proposed Project and the "no project" alternative.

- **Impact PS-1: Wastewater services.** In contrast with the Proposed Project, this alternative would continue to allow agricultural cluster subdivisions to rely on community systems for wastewater disposal. However, under both scenarios, wastewater disposal systems would be designed and constructed in accordance with applicable County and RWQCB standards. With implementation of these standards, impacts would be less than significant under both the Proposed Project and Alternative 1.

- **Impact T-4: Alternative transportation systems.** Under both scenarios, the program would have a minimal effect on alternative transportation systems since development would occur in rural areas with limited to no access to public transit or alternative means of transportation.

6.1.2 Conclusions

Continuation of existing policies relating to agricultural cluster subdivisions (Alternative 1, "no project") would result in greater environmental impacts than the Proposed Project in virtually all subject areas. All identified Class I, *significant and unavoidable*, and Class II, *significant but mitigable*, impacts will be exacerbated under this alternative. The only impacts which are reduced under this alternative relate to visual impacts within the Coastal Zone, and reliability of domestic water systems. These reduced impacts, however, are already identified as Class III, *less than significant*, even under the Proposed Project, and fall below thresholds warranting mitigation. Based upon this analysis, the following conclusions have been reached:

- **This alternative is inconsistent with the project objectives.** This alternative does not meet the objectives of this project. Based on direction from the Board of Supervisors (February 17, 2009), this project is intended to reduce environmental impacts associated with the existing agricultural cluster subdivision program. Additionally, this project is intended to locate cluster development closer to existing infrastructure and services and to align existing agricultural clustering standards with Strategic Growth principles. This alternative anticipates foreseeable future development continuing under existing policies. Therefore, this alternative would not achieve the intended effects of reducing environmental impacts associated with existing policy, or increasing consistency with Strategic Growth principles when compared to existing policy. This alternative would not achieve the intended objectives of this project.

- **This alternative will not avoid any significant impacts associated with the project.** Significant and unavoidable environmental effects (Class I impacts) are anticipated to result from the Proposed Project. These effects pertain to agricultural resources, air quality, greenhouse gas emissions, and noise. This alternative would not avoid any of these identified significant and unavoidable impacts. Furthermore, this alternative is anticipated to exacerbate all of the identified Class I impacts.

- **This alternative is anticipated to increase environmental impacts when compared with the project.** All of the Class I, *significant and unavoidable,* and Class II, *significant but mitigable,* impacts identified under the Proposed Project would be exacerbated under this alternative. Most Class III, *less than significant,* impacts would likewise be exacerbated. Further, under this alternative, impacts related to biological resources and scenic resources (inland area) would potentially increase from a mitigable level to an unavoidable level. Physical impacts, resource capacity impacts, and cumulative impacts are all expected to increase under this alternative.

6.2 ALTERNATIVE 2: CHANGE IN LOCATIONAL CRITERIA

Description

The objective of this alternative is to locate agricultural cluster development in closer proximity to existing infrastructure and services compared to what is required under the Proposed Project. This alternative assumes that the proposed Agricultural Cluster Subdivision Program will be implemented as proposed; however, this alternative also assumes that the locational criteria for agricultural cluster subdivisions would be modified. This alternative presents two options for applying locational criteria to the Inland portion of the project area and one option for the Coastal Zone. This alternative was set up with options to provide additional locational criteria in the Inland portion of the project area and to introduce locational criteria to the Coastal Zone. Each of these sub-alternatives can stand alone, but only one of the two Inland options can be selected.

- **Alternative 2(a): Two Road Miles.** Agricultural cluster subdivisions may be allowable within two road miles of identified URLs, rather than five road miles. As with the Proposed Project, distance would be determined through application of the "remoteness test" as defined in the County LUO: "*…distance shall be measured on the shortest public road route between the reserve line and the site. Private roads are to be included in such measurements only when they provide the only access to the site from a private road.*"

- **Alternative 2(b): Two Straight Miles.** Agricultural cluster subdivisions may be allowable within two *straight* miles of identified URLs, rather than five road miles. Distance would be determined through application of the "straight line" method as defined in the County LUO: "*…distance shall be measured as the shortest line between any point on a lot line of one parcel to any point on a lot line of the other parcel.*"

- **Alternative 2(c): Establish Locational Criteria in the Coastal Zone.** Agricultural cluster subdivisions in the Coastal Zone would be restricted to locations within two road mile of the following URLs: Cambria, Cayucos, Morro Bay, and Los Osos.

Alternative 2(a) and 2(b). The difference between the Proposed Project and Alternative 2(a) and 2(b) is the method in which agricultural properties located between two and five miles of the identified URLs may be divided. Under the Proposed Project, these properties could be divided through either a standard land division or an agricultural cluster subdivision. However, under this alternative, only those agricultural properties located within *two miles* of the identified URLs could be divided with a cluster subdivision. More distant agricultural parcels could only be divided through a standard subdivision. Since the agricultural cluster subdivision has historically been the preferred method for subdividing agricultural properties for residential development (refer to Figure 6.1-1), this alternative would be anticipated to reduce residential development in agricultural areas of the county when compared to the Proposed Project.

Based on the same methodology used for calculating the subdivision and development potential for the Agricultural Cluster Subdivision Program (refer to EIR Section 2.6), Table 6.2-1 shows the number of cluster lots that could be developed within two road and two straight miles of the identified URLs.

Table 6.2-1: Comparison of Cluster Development Potential under Alternative 2

Alternative 2	Eligible Area (acres)[5]	Potential Parcels	Proposed Project (Five Road Miles)		Reduction	
			Acres	Parcels	Acres	Parcels
a: Two Road Miles	55,640	212	119,976	418	(54%)	(49%)
b: Two Straight Miles	85,724	279			(29%)	(33%)

Source: *San Luis Obispo County Department of Planning and Building.*

The following describes how this alternative would change development potential compared to the Proposed Project:

- **Alternative 2(a) - Two Road Miles: 206 fewer cluster parcels.** Under this scenario, agricultural cluster subdivisions would be allowed on parcels located within two road miles (rather than five road miles) of the URLs of Arroyo Grande, Atascadero, San Luis Obispo, San Miguel, Nipomo, Templeton, and Paso Robles. This would reduce the area of the county that could potentially qualify for an agricultural cluster subdivision by 54 percent (119,976 to 55,640 acres) and the number of potential agricultural cluster parcels by 49 percent (418 to 212 parcels). Figure 6.2-1 shows the portions of the county which would be eligible for a cluster subdivision under Alternative 2(a) compared to the Proposed Project.

- **Alternative 2b - Two Straight Miles: 139 fewer cluster parcels.** This alternative is the same as Alternative 2(a), except it would change the method of measurement from *straight line* (as used in the existing ordinance) to *road miles* (as used in the Proposed Project). Use of the straight line method (rather than road miles) increases the two mile eligible area from 55,640 acres to 85,724 acres and the potential number of cluster parcels from 212 to 279. Compared to the Proposed Project, Alternative 2b reduces the area of the county that could potentially qualify for an agricultural cluster subdivision by 29 percent (119,976 to 85,724 acres) and the number of potential cluster parcels by 33 percent (418 to 279 parcels). Figure 6.2-2 shows the portions of the county which would be eligible for a cluster subdivision under Alternative 2(b) compared to the Proposed Project.

Alternative 2(c). In the Coastal Zone, the Proposed Project would allow for the reconfiguration of existing agricultural parcels (regardless of location) into 2.5-acre residential cluster parcels. However, under Alternative 2(c), only agricultural parcels located within two miles of Cambria, Cayucos, Morro Bay, and Los Osos would be eligible for reconfiguration under the program. Figure 6.2-3 shows the portions of the Coastal Zone which would be eligible for a cluster subdivision under this alternative.
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[5] Parcels designated Agriculture that are greater than 40 acres in size

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Figure 6.2-1: Comparison of Eligible Cluster Area under Alternative 2(a)

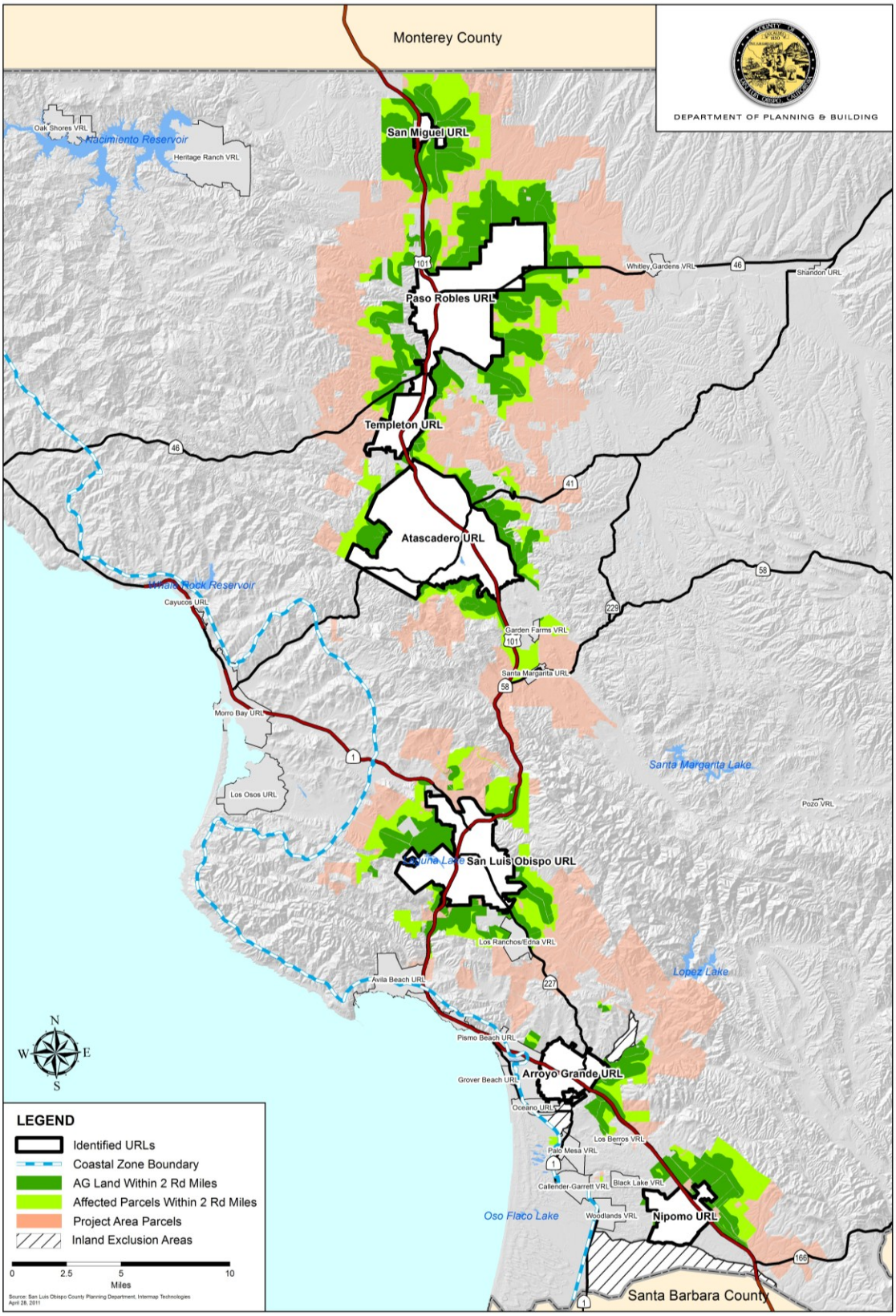

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Figure 6.2-2: Comparison of Eligible Area under Alternative 2(b)

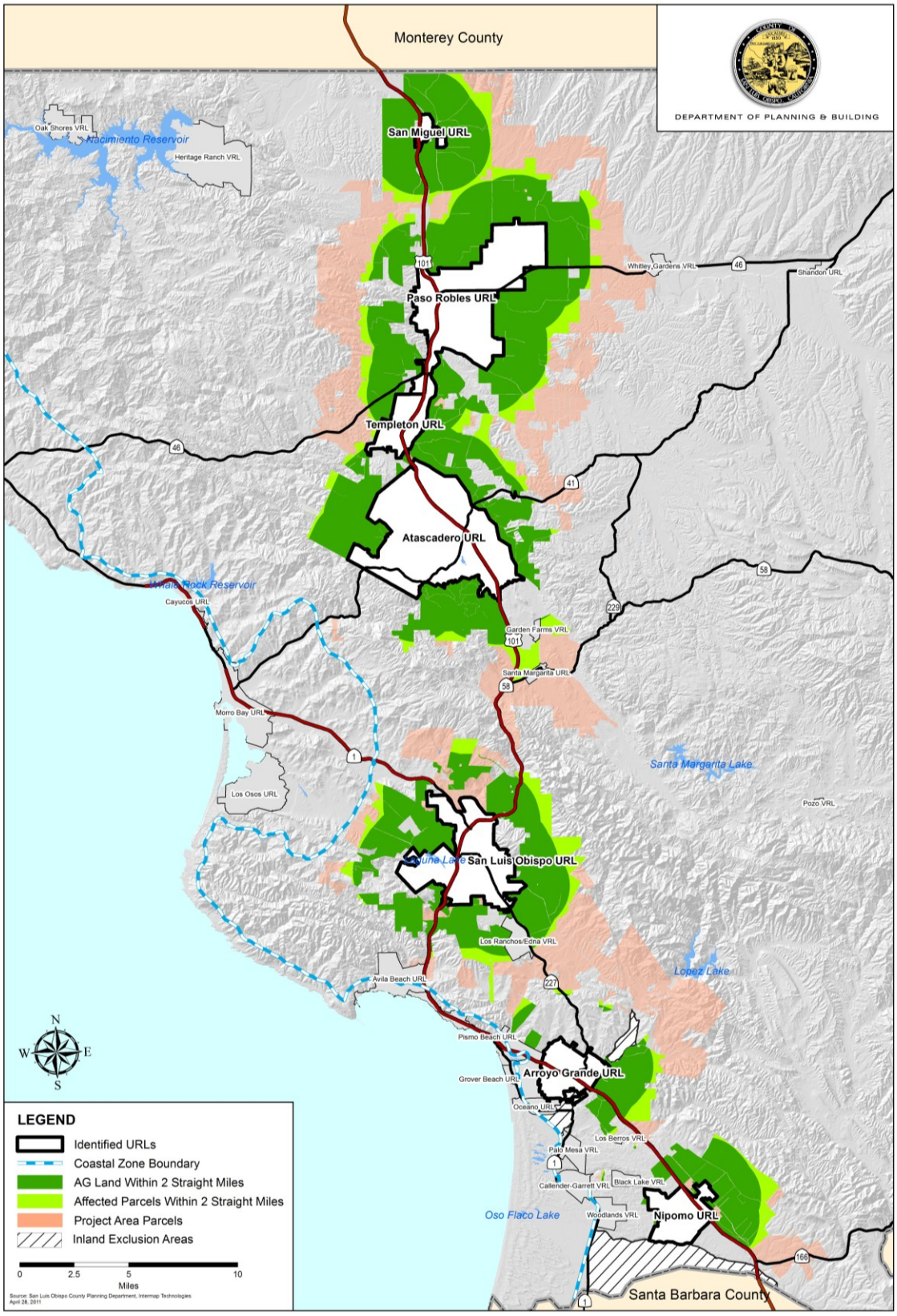

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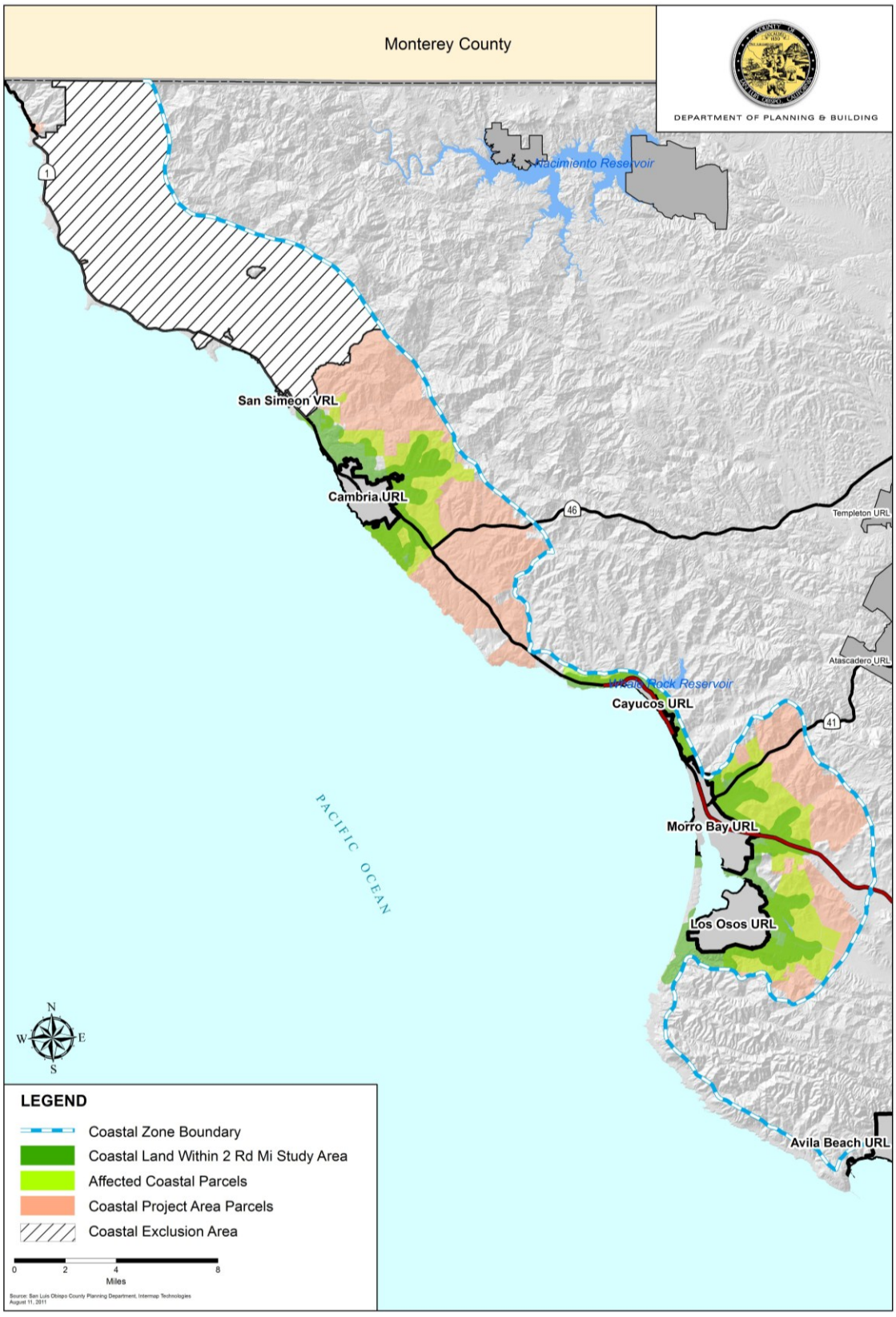
Figure 6.2-3: Comparison of Eligible Area under Alternative 2(c)



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6.2.1 Impact Analysis

Alternative 2(a) and 2(b) - Substantial Change:

The following impacts are anticipated to be substantially different when contrasting Alternative 2(a) and 2(b) with the Proposed Project:

Agricultural Resources. Under this alternative, cluster subdivisions would only be allowed in locations within two road or two straight miles, respectively, of the identified URLs. When compared to the Proposed Project, this would result in a 41 to 56 percent reduction in the number of residential cluster parcels that could be created on agricultural lands in the county. Impacts related to agricultural resources would therefore be anticipated to change as follows:

- **Reduced non-agricultural development on important farmland [AG-1].** By limiting cluster subdivisions to locations within two miles of the identified URLs, this alternative reduces the number of residential cluster parcels that could potentially be created in agricultural areas from 418 to 212 for Alternative 2(a) or 279 for Alternative 2(b). Based on a minimum lot size of 2.5 acres and a maximum lot size of 5 acres, this alternative could result in the conversion of between 530 and 1,060 acres of important farmland mapped by the State Department of Conservation to residential and non-agricultural uses. When compared to the Proposed Project, this is a reduction of between 515 and 1,030 acres.

Table 6.2-2: Reduction in Potential Site Disturbance under Alternative 2

Alternative 2	Potential Cluster Lots	Alternative 2 - Site Disturbance (acres)	Proposed Project - Site Disturbance (acres)	Reduction (acres)
a: 2 Road Miles	212	530 – 1,060	1,045 – 2,090	515 – 1,030 (49%)
b: 2 Straight Miles	279	622.5 – 1,395		

Source: San Luis Obispo County Department of Planning and Building Subdivision and Development Potential Estimates

- **Reduced urban and agricultural land use conflicts [AG-3].** This alternative would retain the proposed restrictive provisions under the Proposed Project while reducing the number of residential cluster parcels that could be created on agricultural lands in the county. As a result, this alternative would reduce the overall amount of interface between residential and agricultural uses and would therefore reduce the potential for urban and agricultural land use conflicts.

- **Improved consistency with Agriculture Element (AE) and Conservation and Open Space Element (COSE) policies concerning the preservation of agricultural lands [AG-4].** This alternative would allow fewer residential cluster parcels on agricultural land and in closer proximity to existing communities when compared with the Proposed Project. As a result, this alternative would be anticipated to improve consistency with the following AE and COSE policies:

- AE Policy 18 and COSE Policy SL 3.1: Protection of agricultural land – Alternative 2(a) and 2(b) would improve consistency with these policies since it would reduce the amount of agricultural land that could be converted to non-agricultural use (refer to Table 6.2-2). The program would also result in the permanent conservation of agricultural land within two miles of the identified URLs through the requirement of an agricultural preservation easement. The program would not redesignate any land currently designated Agriculture. The program would not extend urban services into agricultural areas since it would require residential cluster parcels to accommodate individual on-site wells and septic systems.

Air Quality. Alternative 2(a) and 2(b) would allow fewer residential cluster parcels on agricultural land and in closer proximity to existing communities when compared with the Proposed Project. As a result, air quality impacts would change as follows:

- **Reduced construction-related emissions [AQ-1].** As shown in Table 6.2-3, below, construction-related emissions associated with new cluster development would be anticipated to decrease by ~~47~~ 42 to ~~78~~ 50 percent under Alternative 2(a) and by ~~23 to 67 percent~~21 to 33 percent under Alternative 2(b).

Table 6.2-3: Reduction in Construction Phase Emissions under Alternative 2

Pollutant	Comparison of Construction Emissions (lbs/day)				
	Proposed Project	Alternative		Reduction	
		2(a)	2(b)	2(a)	2(b)
Reactive Organic Gases (ROG)	~~650.94~~ 654.25	~~437.23~~ 334.68	~~318.61 (48.95%)~~ 440.32	319.57 (48.85%) ~~213.71 (32.83%)~~	213.93 (32.70%) ~~437.23~~
Nitrous Oxides (NO_X)	329.26 ~~270.03~~	~~206.11~~ 182.02	~~129.74 (48.04%)~~ 261.02	147.24 (44.72%) ~~63.92 (23.67%)~~	68.24 (20.73%) ~~206.11~~
Carbon Monoxide (CO)	245.48 ~~181.63~~	~~129.99~~ 143.71	~~84.8 (46.69%)~~ 190.86	101.77 (41.5%)~~51.64 (28.43%)~~	54.62 (22.25%) ~~129.99~~
Sulfur Dioxide (SO2)	0.22 ~~0.09~~	~~0.03~~ 0.11	~~0.07 (77.78%)~~ 0.15	0.11 (50%) ~~0.06 (66.67%)~~	0.07 (31.82%) ~~0.03~~
Particulate Matter < 10 microns (PM10)	1,410.29 ~~1,393.59~~	~~930.11~~ 717.51	~~686.71 (49.28%)~~ 944.11	629.78 (49.12%) ~~463.48 (33.26%)~~	466.18 (33.06%) ~~930.11~~

Pollutant	Comparison of Construction Emissions (lbs/day)				
	Proposed Project	Alternative		Reduction	
		2(a)	2(b)	2(a)	2(b)
Particulate Matter <2.5 microns (PM2.5)	306.09 ~~291.09~~	~~194.26~~ 157.38	~~143.45 (49.28%)~~ 206.8	148.71 (48.58%)~~9 6.83 (33.26%)~~	99.29 (32.44%)~~1 94.26~~
Carbon Dioxide (CO2)	46,304.51 ~~32,371.21~~	~~22.105.8~~ 24,905.21	~~17,444.15 (53.89%)~~ 35,156.82	21,399.3 (46.21%)~~1 0,265.41 (31.71%)~~	11,147.69 (24.07%)~~2 2.105.8~~

Source: URBEMIS 2007 (version9.2.4). Refer to Appendix E: URBEMIS Output for Air Quality Analysis.

~~As described in EIR Section 4.2, Air Quality, the construction of more than 30 new residential units in a given year could exceed SLOAPCD's 2.5 tons per quarter threshold for ozone precursors. Over a 20 year build out period, Alternative 2(a) and 2(b) could result in the construction of 11 and 14 units per year, respectively, which is less than the 30 units per year threshold. As for particulate matter emissions from construction activities, both~~ Both the Proposed Project and Alternative 2(a-b) are anticipated to fall below SLOAPCD's 2.5 tons-per-quarter threshold for ~~,~~ ozone precursors and PM10 emissions. Nevertheless, since the County of San Luis Obispo is currently in non-attainment with the state standard for these pollutants, program impacts with respect to these pollutants would be considered cumulatively significant. In addition, development under any of these scenarios could be located in close proximity to existing sensitive receptors. However, with implementation of the mitigation measures identified in Section 4.2: Air Quality, impacts would be reduced to a less than significant level for both the Proposed Project and Alternative 2(a) and 2(b).

- **Reduced operational emissions [AQ-2].** As shown in Table 6.2-4, below, operational phase associated with new cluster development would be anticipated to decrease by ~~69~~ 49 to ~~82~~ 56 percent under Alternative 2(a) and by 3~~3~~4 to 42~~78~~ percent under Alternative 2(b). ~~This alternative would reduce ozone precursors and PM10 emissions below SLOAPCD's 25 pounds per day threshold. It would also reduce PM2.5 emissions, but not below the applicable threshold.~~However, emissions would still exceed SLOAPCD's 25 pounds-per-day threshold for ozone precursors and PM10.

Table 6.2-4: Reduction in Operational Phase Emissions under Alternative 2

Pollutant	Comparison of Operational Emissions (lbs/day)					
	Proposed Project	Threshold	Alternative		Reduction	
			2(a)	2(b)	2(a)	2(b)
Ozone Precursors (ROG + NO_X combined)	~~56.85~~ 149.79	***25***	~~17.44~~ 75.99	~~22.95~~ 77.79	73.8 (49.27) ~~39.41 (69.32%)~~	72 (48.07%) ~~33.90 (59.63%)~~
Carbon Monoxide (CO)	605.37 ~~277.57~~	***550***	~~80.91~~ 307.02	~~106.47~~ 390.12	298.38 (49.28%) ~~196.66 (70.85%)~~	215.25 (35.56%) ~~171.10 (61.64%)~~
Particulate Matter < 10 microns (PM10)	89.53 ~~35.86~~	***25***	45.42 ~~7.73~~	59.72 ~~10.17~~	44.11 (49.27%) ~~28.13 (78.44%)~~	29.81 (33.30%) ~~25.69 (71.64%)~~
Particulate Matter <2.5 microns (PM2.5)	~~6.92~~ 17.52	***1.25***	8.73 ~~1.51~~	11.45 ~~.99~~	8.79 (50.17%) ~~5.41 (78.17%)~~	6.07 (34.65%) ~~4.93 (71.24%)~~
Carbon Dioxide (CO2)	53,272.82 ~~25,932.48~~	***N/A[1]***	27,018.77 ~~4,412.77~~	31,074.38 ~~5,807.38~~	26,254 (49.28%) ~~21,519.38 (82.30%)~~	22,198.44 (41.67%) ~~20,125.10 (77.61%)~~

[1]See discussion below under Impact GHG-1 for an evaluation of impacts related to CO2 emissions.
Source: URBEMIS 2007 (version9.2.4). Refer to Appendix E: URBEMIS Output for Air Quality Analysis.

- **Increased consistency with the Clean Air Plan [AQ-3].** This alternative would allow fewer residential cluster parcels on agricultural land and in closer proximity to existing communities when compared with the Proposed Project. As such, this alternative increases consistency with Clean Air Plan policies and strategies designed to focus new residential development within existing communities. Focusing growth towards urban areas facilitates reductions in vehicle miles traveled, thereby reducing vehicle emissions.

Biological Resources. When compared to the Proposed Project, this alternative would result in a 49 percent reduction in the amount of undeveloped rural and agricultural lands that could be disturbed by agricultural cluster development. As a result, potential impacts to biological resources would be anticipated to change as follows:

- **Reduced impacts to sensitive habitats [BR-1], special status species [BR-2], and wildlife movement corridors [BR-3].** This alternative would allow fewer residential cluster parcels on agricultural land and in closer proximity to existing communities when compared with the Proposed Project. It would also retain the proposed restrictive

provisions requiring a physically contiguous parcel layout, avoiding environmentally sensitive areas to the maximum extent feasible. Potential impacts to sensitive habitats, special status species, and wildlife corridors would therefore be reduced under this alternative.

Cultural Resources. When compared to the Proposed Project, Alternative 2(a) and 2(b) would result in a 49 percent reduction in the amount of undeveloped rural and agricultural lands that could be disturbed by agricultural cluster development. As a result, potential impacts to cultural resources would be anticipated to change as follows:

- **Reduced impacts to historic resources [CR-1], pre-historic archaeological resources [CR-2], and paleontological resources [CR-3].** This alternative would allow fewer residential cluster parcels on agricultural land and in closer proximity to existing communities when compared with the Proposed Project. It would therefore be anticipated to reduce potential impacts to historic resources, pre-historic archaeological resources, and paleontological resources.

Geologic Hazards. When compared to the Proposed Project, Alternative 2(a) and 2(b) would result in a 49 percent reduction in the amount of undeveloped rural and agricultural lands that could be disturbed by agricultural cluster development. As a result, potential impacts related to geologic hazards would be anticipated to change as follows:

- **Reduced impacts resulting from residential development in areas with soil hazards [G-2].** When compared to the Proposed Project, Alternative 2(a) and 2(b) would reduce the potential for new residential development to be located within areas subject to landslide and liquefaction hazards. As shown in Figure 4.5-2 in Section 4.5, Geologic Hazards, the inland project area includes 8,063 acres of land within a mapped liquefaction or landslide Geologic Study Area (GSA). Under Alternative 2(a), the portion of the inland project area within a liquefaction or landslide GSA is reduced by 72 percent to 2,230 acres (refer to Figure 6.2-3). Impacts related to soil hazards would therefore be reduced under this alternative.

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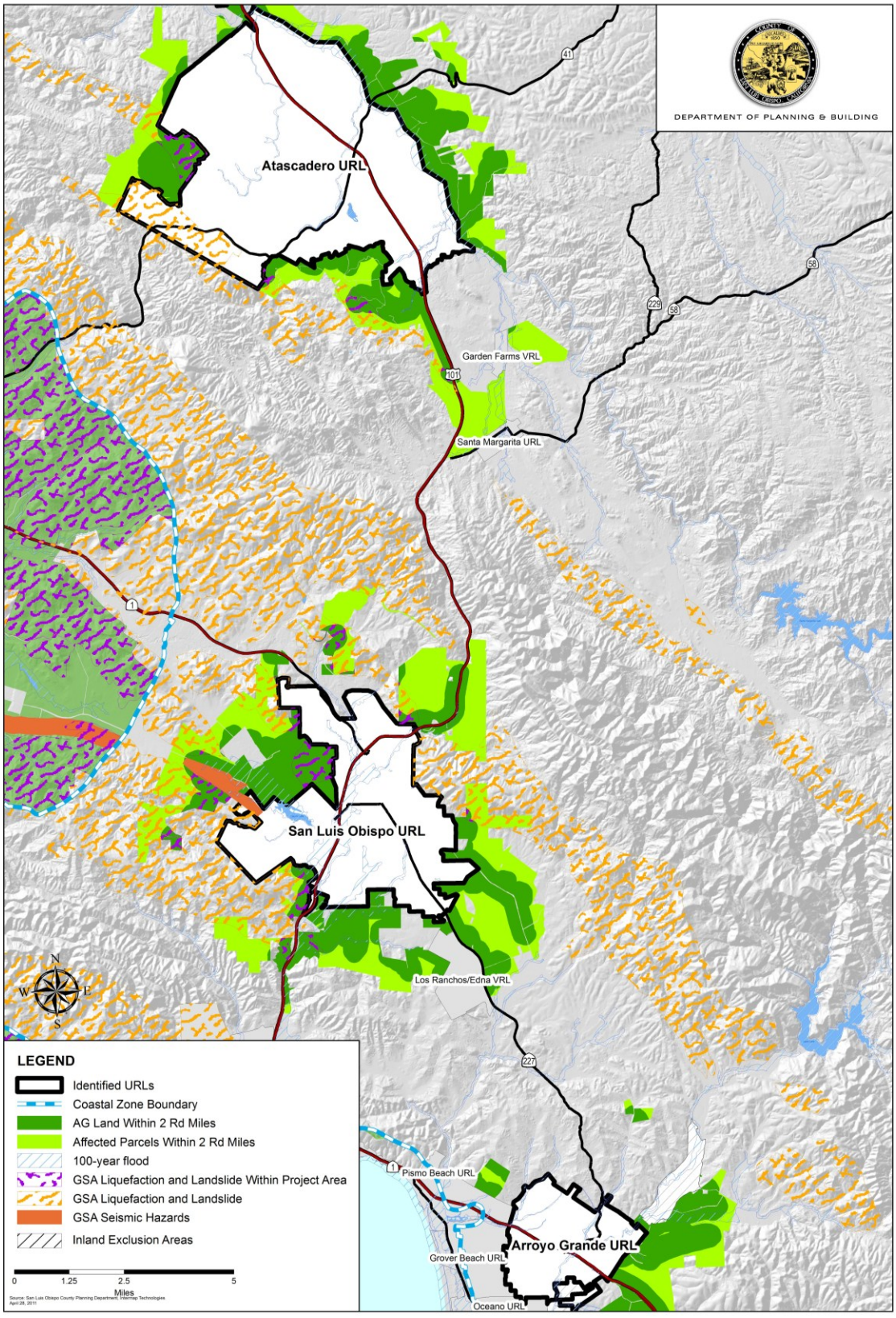
Figure 6.2-4: Alternative 2(a) Geologic Hazards Overlay



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Greenhouse Gases. This alternative would allow fewer residential cluster parcels on agricultural land and in closer proximity to existing communities when compared with the Proposed Project. As a result, potential impacts related to greenhouse gas emissions would be anticipated to change as follows:

- **Reduced greenhouse gas impacts [GHG-1].** Over a 20 year build-out period, the Proposed Project would generate between 570.76 and 10,438.88 metric tons CO_2E per year. GHG emissions would be reduced by 49 percent under Alternative 2a and by 33 percent under Alternative 2b. This reduction is primarily attributable to the 41 to 56 percent reduction in development potential that would result from limiting cluster subdivisions to areas within two miles of URLs.
- ~~Greenhouse gas impacts are considered significant if anticipated emissions would exceed 4.6 metric tons CO_2E/year per capita. Over a 20-year build-out period, the Proposed Project would generate approximately 5.82 metric tons CO_2E /year per capita, exceeding the annual per capita threshold by 1.22 metric tons. Under Alternative 2, however, emissions would be reduced below the per capita threshold to 3.96 metric tons CO_2E. This reduction is primarily attributable to the limiting of cluster subdivisions to locations within two miles of identified urban reserve areas (rather than five miles under the Proposed Project).~~

Table 6.2-5: Reduction in GHG Emissions under Alternative 2

Emission Type	Annual Emissions (CO_2E)[6]			
	Proposed Project	Alternative 2a	Alternative 2b	Reduction
Minimum	570.76	292.31	384.47	33 – 49%
Average	5,504.82	2,784.74	3,674.95	
Maximum	10,438.88	5,277.17	6,965.43	

Source:
Area Source Emissions from URBEMIS 2007 (version 9.2.4).
CCAR General Reporting Protocol, Reporting Entity-Wide Greenhouse Gas Emissions, Version 3.1, January 2009, page 33-40.Refer to Appendix F for GHG emission factor assumptions and calculations.

~~**Table 6.2-5: Reduction in GHG Emissions under Alternative 2**~~

~~Emission Type~~	~~Annual Emissions (CO_2E)[7] in Metric Tons~~			
	~~Proposed Project~~	~~Alternative 2a~~	~~Alternative 2b~~	~~Reduction~~
~~Mobile Emissions~~	~~3,289~~	~~754~~	~~992~~	~~70% - 77%~~
~~On Site Operational~~	~~2,320~~	~~1,177~~	~~1,548.31~~	~~33% - 49%~~
~~Construction~~	~~30~~	~~14.93~~	~~18.35~~	~~39% - 50%~~
~~**Total Emissions**~~	~~**5,639**~~	~~**1,945**~~	~~**2,559**~~	~~**55% - 66%**~~
~~Population~~	~~969~~	~~491~~	~~647~~	~~51% – 67%~~
~~**Per Capita**~~	~~**5.82**~~	~~**3.96**~~	~~**3.96**~~	~~**51%**~~

[6] Average emissions over a 20-year build-out period.
~~[7] Average emissions over a 20-year build-out period.~~

~~Source:~~
~~*Area Source Emissions from URBEMIS 2007 (version 9.2.4).*~~
~~*CCAR General Reporting Protocol, Reporting Entity-Wide Greenhouse Gas Emissions, Version 3.1, January 2009, page 33-40.Refer to Appendix F for GHG emission factor assumptions and calculations.*~~

Hydrology and Water Quality. When compared to the Proposed Project, Alternative 2(a) and 2(b) would result in a 49 percent reduction in the amount of undeveloped rural and agricultural lands that could be disturbed by agricultural cluster development. As a result, potential impacts related to hydrology and water quality would be anticipated to change as follows:

Reduced impacts from alteration of drainage courses [HWQ-1], and alteration of drainage conditions [HWQ-2]. Compared to the Proposed Project, this alternative would reduce the amount of land that could be graded for the construction of new residences and associated infrastructure (e.g. new roads, utility lines, etc.). Consequently, potential impacts related to the alteration of drainage courses ("hydromodification") and natural drainage conditions would be reduced under this alternative. However, under both scenarios, implementation of existing ordinance standards requiring drainage plan review and the mitigation measures identified in Section 4.7, Hydrology wand Water Quality, would reduce these impacts to a less than significant level.

- **Reduced erosion and sedimentation impacts [HWQ-3].** Compared to the Proposed Project, impacts related to erosion and sedimentation would be reduced under this alternative. However, under both scenarios, implementation of existing ordinance standards requiring erosion and sedimentation control plan review would reduce impacts to a less than significant level.

- **Reduced development in flood hazard areas [HWQ-4].** Under this alternative, fewer residences could be constructed in flood hazard areas. However, under both scenarios, implementation of existing ordinance standards for development in flood hazard areas (LUO Chapter 22.14 /CZLUO Chapter 23.07) would reduce impacts to a less than significant level.

- **Reduced discharge of stormwater and non-stormwater pollutants [HWQ-5].** Potential impacts related to pollutant discharge would be reduced under this alternative. However, under both scenarios, implementation of existing ordinance standards requiring Stormwater Pollution Prevention Plan (SWPPP) and erosion and sedimentation control plan review would reduce these impacts to less than significant levels.

Noise. This alternative would allow fewer residential cluster parcels on agricultural land and in closer proximity to existing communities when compared with the Proposed Project. As a result, potential impacts related to noise would be anticipated to change as follows:

- **Reduced noise impacts related to construction activities [N-1].** Construction-related noise impacts would be reduced under this alternative due to the anticipated reduction

in cluster development potential. However, under both scenarios, implementation of existing ordinance standards limiting construction hours and the required noise reduction plan (Mitigation Measures N-1) would reduce this impact to a less than significant level.

- **Reduced traffic noise affecting existing sensitive receptors [N-2].** As this alternative would reduce vehicle trips on County roadways, it would be also anticipated to reduce the amount of traffic noise affecting existing sensitive receptors. Nevertheless, under this alternative, the proposed program could increase noise beyond acceptable levels (60 dB) at existing sensitive receptors (primarily residences) located along affected roadways. The only way to mitigate this impact would be to retrofit existing sensitive receptors with noise attenuation (e.g. solid core doors, and/or double paned windows) or to construct off-site noise barriers (e.g. sound walls). These measures would rely on the cooperation of off-site property owners, which cannot be assured. Impacts would therefore remain Class I, *significant and unavoidable.*

- **Reduced impacts on new sensitive noise receptors [N-3].** Compared to the Proposed Project, fewer new residences would be located along major County roadways and highways where traffic noise is anticipated to exceed maximum allowed interior and exterior noise levels pursuant to LUO Section 22.10.120 / CZLUO Section 23.06.040. Nevertheless, under both scenarios, individual projects would be reviewed for compliance with the County Noise Element and projects which would expose sensitive receptors to unacceptable noise levels would be required to incorporate the mitigation packages provided in the County's Acoustical Design Manual.

- **Reduced residential exposure to agricultural noise [N-4].** This alternative would allow fewer residences in agricultural areas and would therefore reduce the potential for individual residences to be exposed to agricultural noise. However, individual projects would be required to comply with existing agricultural buffer policies, which aim to minimize land use conflicts (including noise exposure) between residential and agricultural uses. Therefore, under both scenarios, implementation of existing buffer policies would reduce this impact to a less than significant level.

Public Services and Utilities. This alternative would allow fewer residential cluster parcels on agricultural land and in closer proximity to existing communities when compared with the Proposed Project. As a result, potential impacts related to public services and utilities would be expected to change as follows:

- **Reduced impacts to wastewater services [PS-1].** Under this alternative, fewer residences could be constructed in rural/agricultural areas of the county. As required under the proposed program, these residences would be served by individual on-site septic systems. This alternative would therefore reduce the potential for health hazards and water quality impacts associated with the establishment of new septic systems. Nonetheless, with implementation of existing ordinance standards governing the siting and design of septic systems, impacts would be less than significant under both scenarios.

- **Reduced demands on the San Luis Obispo County Sherriff Department, Cal Fire, and other emergency service providers [PS-2]; parks, recreational facilities, and libraries [PS-3]; and schools [PS-4].** This alternative would reduce demands placed on public safety services, parks, recreational facilities, libraries, and schools. While cluster development under Alternative 2 could require the construction of new facilities in order to maintain acceptable levels of service, at this time, it is speculative to determine the nature of future site specific impacts that may be secondary effects of this project (*CEQA Guidelines Section 15145*).

- **Reduced impacts related to solid waste disposal [PS-6].** This alternative would reduce demands placed on existing landfill capacities. However, under both scenarios, with implementation of existing ordinance requirements, this impact would be less than significant.

Traffic. This alternative would allow fewer residential cluster parcels on agricultural land and in closer proximity to existing communities when compared with the Proposed Project. As a result, potential traffic impacts would be expected to change as follows:

- **Reduced impacts to county roadways and intersections [T-1].** When compared to the Proposed Project, this alternative would reduce vehicle trips in rural areas of the county by 33 to 49 percent (refer to Table 6.2-6). This alternative would also be anticipated to reduce countywide vehicle miles travelled as it would require cluster development to be located closer to existing urban reserve areas. As a result, this alternative would be anticipated to reduce impacts to county roadways and intersections. Nevertheless, under both scenarios, impacts could be mitigated to a less than significant level on a case-by-case basis for future agricultural cluster subdivisions through the payment of road impact fees and/or the construction of new roadway improvements.

Table 6.2-6: Reduction in Average Daily Trips (ADT) under Alternative 2

Proposed Project (ADT)	Alternative (ADT)		Reduction (ADT)	
	2a	2b	2a	2b
4,180	2,120	2,790	2,060 (49%)	1,390 (33%)

Source: Estimates by County Department of Planning and Building based on ITE trip generation rates

- **Reduced potential for sight distance hazards [T-2], and secondary access impacts [T-3].** This alternative would reduce the potential for sight distance hazards and secondary access impacts to occur in rural/agricultural areas. However, under both scenarios, with review of individual projects by Public Works and Cal Trans and implementation of the mitigation measures already identified in Section 4.10, Traffic, impacts would remain less than significant.

Visual Resources. This alternative would allow fewer residential cluster parcels on agricultural land and in closer proximity to existing communities when compared with the Proposed Project. As a result, visual impacts would be expected to change as follows:

- **Reduced impacts on scenic vistas [VR-1], viewsheds from state scenic highways [VR-2], and the rural, agrarian character of the project area [VR-3].** Compared to the Proposed Project, this alternative would result in fewer residences and associated infrastructure being constructed in rural/agricultural areas of the county, and would locate development closer to existing urban areas. As a result, impacts to scenic vistas, viewsheds from state scenic highways, and the rural, agrarian character of the project area would be reduced. However, with implementation of the mitigation measures already identified in Section 4.11, Visual Resources, impacts would be less than significant under both scenarios.

- **Reduced impacts caused by night lighting and glare [VR-4].** Compared to the Proposed Project, this alternative would reduce the number of residences that could be constructed in rural/agricultural areas, thereby reducing potential impacts related to night lighting and glare. However, with implementation of the mitigation measures already identified in Chapter 4.11, Visual Resources, impacts would remain insignificant under both scenarios.

Water Resources. This alternative would allow fewer residential cluster parcels on agricultural land and in closer proximity to existing communities when compared with the Proposed Project. As a result, impacts to water resources would be expected to change as follows:

- **Reduced impacts to constrained water basins [WR-1].** This alternative would reduce the number of new residences that could be developed in areas with constrained water basins. Impacts to constrained water basins would therefore be reduced under this alternative.

- **Improved consistency with Agriculture Element (AE) Policy 11 and Conservation and Open Space Element (COSE) Policy WR 1.7 [WR-2].** This alternative would improve consistency with these policies since it would reduce the number of new residences that would be constructed in agricultural areas, thereby reducing competition between residential and agricultural uses for existing water supplies. Moreover, this alternative would retain the proposed requirement for a hydrogeologic analysis to verify that adequate water resources are available to service future residential development without impacting water supplies for existing and future agricultural uses.

- **Reduced impacts to water quality [WR-4].** Residential water quality could be affected by adjacent agricultural uses. For example, fertilizers used by homeowners can leach into the groundwater resulting in increased nitrate levels. In some circumstances, the nitrates, minerals, and dissolved solids could exceed drinking water standards. This alternative would decrease the magnitude of this impact since it would allow for fewer new residences to be constructed in agricultural areas. Nevertheless, under both

scenarios, with implementation of existing ordinance standards, this would remain a less than significant impact.

Growth Inducing Impacts. Alternatives 2(a) and 2(b) would result in 206 and 139 fewer residential units, respectively, when compared to the Proposed Project. Based on a factor of 2.46 persons per dwelling unit, this would result in a potential reduction of up to 507 residents under Alternative 2(a) or 342 residents under Alternative 2(b). This represents a reduction of approximately .1855 percent below the current County population (273,231; California Department of Finance, January 2010). Therefore, compared to the Proposed Project, this alternative would decrease demands for such services as landscaping, gardening, home cleaning, and maintenance. However, under both scenarios, new residents are expected to draw on existing retail and commercial services already available in the county, rather than inducing new service providers to relocate to the area.

Land Use Policy Consistency. This alternative would allow fewer residential cluster parcels on agricultural land and in closer proximity to existing communities when compared with the Proposed Project. Consequently, this alternative could reduce the potential for environmental impacts and land use conflicts resulting from agricultural cluster subdivisions. Compared to the Proposed Project, this alternative would therefore be anticipated to change land use policy consistency as follows:

- **Improved consistency with Strategic Growth policies and principles.** The Strategic Growth policies and principles of the County Land Use Element discourage increased residential development outside of established urban reserve areas. This alternative improves consistency with these policies and principles since it would reduce development potential in rural areas of the county and locate future cluster subdivisions in closer proximity to existing urban areas.

- **Improved consistency with Agriculture Element (AE) and Conservation and Open Space Element (COSE) policies concerning the preservation of agricultural lands.** This alternative would allow fewer residential cluster parcels on agricultural land and in closer proximity to existing communities when compared with the Proposed Project. As a result, this alternative would be anticipated to improve consistency with the following AE and COSE policies:

    - AE Policy 11: Agricultural water supplies – Alternative 2(a) and 2(b) would improve consistency with this policy since it would reduce the number of new residences that could be constructed in agricultural areas, thereby reducing competition between residential and agricultural uses for existing water supplies. Moreover, this alternative would retain the proposed requirement for a hydrogeologic analysis to verify that adequate water resources are available to service anticipated residential uses without impacting water supplies for existing and future agricultural uses.

    - AE Policy 18 and COSE Policy SL 3.1: Protection of agricultural land – Alternative 2(a) and 2(b) would improve consistency with these policies since it

would reduce the amount of agricultural land that could be converted to non-agricultural use (refer to Table 6.2-2). The program would also result in the permanent conservation of agricultural land within two miles of the identified URLs through the requirement of an agricultural preservation easement. The program would not redesignate any land currently designated Agriculture. The program would not extend urban services into agricultural areas since it would require residential cluster parcels to accommodate individual on-site wells and septic systems.

- **Improved consistency with Conservation and Open Space Element policies concerning the sustainability of environmental resources.** This alternative would allow fewer residences on agricultural land and in closer proximity to existing communities when compared with the Proposed Project. As a result, this alternative would be anticipated to reduce impacts on environmental resources (e.g. agricultural soils, water, air quality, etc) and would therefore improve consistency with Conservation and Open Space Element policies concerning the sustainability of environmental resources.

Alternative 2(a) and 2(b) - No Substantial Change:

The following impacts are not anticipated to be substantially different when contrasting Alternative 2(a) and 2(b) with the Proposed Project:

- **Impact AG-2: Conversion of prime agricultural soils.** Both Alternative 2 and the Proposed Project would retain the restrictive provision prohibiting the development of structures on soils with an NRCS capability classification of I or II ("prime soils"). Therefore, under both scenarios, new development would not be anticipated to occur on prime agricultural soils.

- **Impact AG-4: Consistency with the Agriculture Element (Policy 17: Agricultural buffers).** Alternative 2 would not substantially change consistency with this policy. Under both the Proposed Project and Alternative 2, agricultural cluster subdivisions would be required to include agricultural buffers in accordance with existing policies. Additionally, this alternative would retain the 2.5 – 5 acre minimum parcel size, which would ensure that residential parcels are sufficiently sized to accommodate agricultural buffers.

- **Impact G-2: Residential development near fault zones.** The Los Osos fault, the only Alquist-Priolo fault zone located within the project area, is located primarily within the Coastal Zone. This alternative only affects where agricultural clusters could occur in the inland portion of the county and would therefore not change development or subdivision potential in the Coastal Zone. A portion of the Los Osos fault zone is located in the rural San Luis Obispo inland planning area; however, under both the Proposed Project and Alternative 2, agricultural cluster subdivisions could occur along this section of the Los Osos fault zone.

- **Impact HWQ-6: Agricultural pollutants.** This impact presumes that the Proposed Project would cause some landowners to intensify agricultural uses in order to qualify for an agricultural cluster subdivision, since properties could no longer qualify based on soil capability. This alternative would also require agricultural cluster subdivisions to quality based on the use test, and would therefore result in the same potential impact. Nevertheless, under both scenarios, this impact would be less than significant.

- **Impact T-4: Alternative transportation systems.** Under both scenarios, the program would have a minimal effect on alternative transportation systems since development would occur in rural areas with limited to no access to public transit or alternative means of transportation.

- **Impact WR-3: Reliable water service.** Under both the Proposed Project and Alternative 2, individual wells would be located on residential cluster parcels. This could result in less reliable residential water service compared to small community water systems. Nevertheless, under both scenarios, this impact would be less than significant.

Alternative 2(c) – Substantial Change:

In the Coastal Zone, the Proposed Project allows for the reconfiguration of existing underlying parcels (regardless of proximity to urban areas) into new residential cluster parcels. Cluster projects in the Coastal Zone would be subject to various restrictive provisions intended to reduce environmental impacts. For example, the proposed amendments would require residential development to be located in the least environmentally sensitive area with the remainder of the property placed under a permanent agricultural preservation easement. Alternative 2(c) would reduce the number of existing underlying lots in the Coastal Zone which would be eligible for reconfiguration under the program. Therefore, without the cluster option available, a greater number of underlying lots would be developed in their current configuration. Such development would not be subject to the restrictive provisions of the proposed program and, in many cases, would not be subject to environmental review. Alternative 2(c) would therefore be anticipated to increase environmental impacts in the following subject areas:

- Agricultural Resources
- Biological Resources
- Cultural Resources
- Geologic Hazards
- Hydrology and Water Quality
- Visual Resources
- Water Resources
- Land Use Policy Consistency

Alternative 2(c) – No Substantial Change:

Under both the Proposed Project and Alternative 2(c), no new parcels would be created in the Coastal Zone. Therefore, under both scenarios, a similar number of new residences would be developed. As a result, Alternative 2(c) would not substantially change impacts in the following subject areas:

- Air Quality
- Greenhouse Gas
- Public Services/Utilities
- Traffic
- Growth Inducing

6.2.2 Conclusions

Both Alternative 2(a) and 2(b) would reduce environmental impacts in virtually all subject areas due to the anticipated reduction in development potential and location of development closer to existing urban areas. Impact GHG-1 would be reduced from a Class I, *significant and unavoidable*, impact to a Class II, *significant but mitigable*, impact. Alternative 2(c), however, would result in either equivalent or greater environmental impacts in each subject area. Based upon this analysis, the following conclusions have been reached:

- **This alternative is consistent with the project objectives.** This alternative meets the objectives of the project. Based on direction from the Board of Supervisors (February 17, 2009), this project is intended to reduce environmental impacts associated with the existing agricultural cluster subdivision program. Additionally, this project is intended to locate cluster development closer to existing infrastructure and services and to align existing agricultural clustering standards with Strategic Growth principles. Compared to the existing ordinance, which allows for agricultural cluster subdivisions in most rural/agricultural areas of the inland area, this alternative would focus agricultural cluster subdivisions within a specified distance from identified URLs. Consequently, this alternative would reduce the environmental impacts associated with existing policy and would improve consistency with Strategic Growth principles when compared to existing policy.

- **Alternative 2(a) and 2(b) will reduce the severity of all significant and unavoidable impacts.** Significant and unavoidable environmental effects (Class I impacts) are anticipated to result from the Proposed Project. These effects pertain to agricultural resources, air quality, greenhouse gas emissions, noise, and water resources (cumulative). Alternative 2(a) and 2(b) would reduce Impact GHG-1, greenhouse gas emissions, from a Class I, *significant and unavoidable*, impact to a Class II, *significant but mitigable*, impact. Alternative 2(a) and 2(b) would also reduce the magnitude of the other Class I impacts, but not to a level of insignificance. For example, it would reduce the amount of important farmland converted to non-agricultural uses from between 1,040 and 2,090 acres to between 530 and 1,395 acres, a 49 percent reduction; nevertheless, the conversion of up to 1,395 acres of important farmland is considered a significant and unavoidable impact.

- **Alternative 2(a) and 2(b) is anticipated to reduce environmental impacts when compared with the project; while Alternative 2(c) would increase impacts in several subject areas.** Alternative 2(a) and 2(b) would increase the magnitude of all Class I, *significant and unavoidable*, Class II, *significant but mitigable*, and Class III, *less than significant*, impacts. Alternative 2(c) would increase impacts in the following subject areas: agricultural resources, biological resources, geologic hazards, hydrology and water quality, visual resources, water resources, and land use policy consistency.

6.3 ALTERNATIVE 3: REDUCING RESIDENTIAL PARCEL SIZE

Description

Under this alternative, the Agricultural Cluster Subdivision Program would be implemented as proposed; however, the minimum parcel size for residential cluster parcels would be reduced from 2.5 acres to 10,000 square feet. Since existing policies require new parcels less than 2.5 acres to be serviced by community water and wastewater systems, this alternative would also remove the requirement for new cluster lots to contain individual on-site wells and septic systems.

The objective of this alternative is to reduce the footprint of residential cluster parcels on agricultural land. However, smaller parcels would not contain sufficient area to accommodate the required residential infrastructure and agricultural buffers on site. As a result, these non-agricultural uses would instead be established on the agricultural parcel. The overall footprint of residential and non-agricultural development on agricultural land would therefore be similar when comparing this alternative to the Proposed Project.

Compared to the Proposed Project, this alternative could theoretically increase the number of residences that could result from an agricultural cluster subdivision. This is due to the fact that the 2.5-acre minimum parcel size established under the Proposed Project could make it difficult for applicants to design an agricultural cluster subdivision that accommodates the maximum number of possible residential parcels and other residential components within the five percent developable area. For example, a property with 360 acres of vineyards may qualify for up to 9 residential cluster parcels; however, given the 2.5-acre minimum size, these 9 cluster parcels would occupy an area of 22.5 acres or 6.25 percent of the overall 360-acre property. In this scenario, the project would have to be reduced from 9 cluster parcels in order to comply with the five percent limitation on residential development. In comparison, by reducing the minimum parcel size to 10,000 square feet, this alternative could allow the 9 residential parcels to be accommodated within the five percent developable area.

However, the scenario described above overstates the effect of parcel size on development potential for two reasons. First, it's uncommon for a property to qualify for an agricultural cluster subdivision with only the minimum acreage of a qualifying use. More often, agricultural properties contain additional undeveloped land which is either not in agricultural production or is used for grazing. This land could provide the additional area needed to accommodate the residential cluster parcels without exceeding the five percent limitation. Second, under this alternative, the need to meet agricultural buffer requirements and provide community water and wastewater systems would result in similar limitations as the 2.5-acre minimum parcel size relative to the five percent developable area. In other words, although a cluster subdivision could accommodate more 10,000 square-foot parcels within five percent of the site, the agricultural buffers and infrastructure for these parcels would also have to be accommodated within the five percent developable area. Therefore, this alternative is anticipated to have similar development potential as the Proposed Project.

Achievement of Objectives

Objective	Complies?	Discussion
Improve access to existing infrastructure and services. Locate agricultural cluster subdivisions near existing infrastructure.	Yes	Under this alternative, cluster development would be located in closer proximity to existing infrastructure and services compared to the existing ordinance which allows cluster development in more remote areas of the county.
Implement Strategic Growth policies. Align the agricultural cluster ordinance standards with the County's adopted Strategic Growth policies of the County Land Use Element, which encourage development to be located within existing urban areas with adequate infrastructure and resources to accommodate future population growth.	Yes	This alternative would restrict cluster subdivisions to locations within five miles of identified URLs and strengthen review criteria and design standards for cluster projects, consistent with the intent of the County's Strategic Growth policies.
Introduce program to the Coastal Zone. Introduce the agricultural cluster subdivision program to the Coastal Zone to allow the reconfiguration of existing legal underlying lots into residential cluster parcels.	Yes	This alternative would introduce agricultural clustering provisions into the Coastal Zone Land Use Ordinance.
Accommodate cluster development. Accommodate agricultural cluster subdivisions through clustering of small, self-sustaining parcels near existing infrastructure and away from remote agricultural lands.	Yes	This alternative would allow for the creation of residential cluster lots as small as 10,000 square feet in size on agricultural land within five miles of the identified URLs.
Avoid creation of new land use conflicts. Minimize land use conflicts between residential development and existing and future agricultural operations.	Yes	This alternative includes all of the proposed restrictive provisions intended to avoid agricultural/residential land use conflicts, including the clarification of agricultural buffer requirements.
Protect important farmland. Reduce the amount of important farmland potentially converted to residential and non-agricultural uses in the Agriculture land use category.	Yes	This alternative would restrict residential development from occurring on prime agricultural soils, and would limit residential development to no more than five percent of an agricultural property.

6.3.1 Impact Analysis

Substantial Change

The following impacts are anticipated to be substantially different when contrasting the Alternative 3 and the Proposed Project:

Agricultural Resources. Under this alternative, smaller residential cluster parcels and associated community water and wastewater systems could be developed on agricultural lands in the county. This alternative would retain the same restrictive provisions as the Proposed Project. Many of these provisions would reduce impacts on agricultural resources. For example: new structures would not be allowed on prime agricultural soils; cluster parcels would be required to be physically contiguous to each other; residential development would be limited to five percent of the property; a permanent agricultural preservation easement would be placed over 95 percent of the property; and a hydrogeologic analysis would be required to verify the availability of water for residential development without impacting water supplies for existing and future agricultural uses. Compared to the Proposed Project, this alternative would therefore be anticipated to change impacts related to agricultural resources as follows:

- **Increase in urban and agricultural land use conflicts [AG-3].** Under this alternative, smaller residential cluster parcels could be created on agricultural land. This could result in reduced distances between residences and adjacent agricultural uses, thereby increasing the potential for conflicts. Additionally, this alternative would allow for small community water and wastewater systems to be developed on agricultural parcels. Community water systems would compete directly with agricultural uses for groundwater. Community wastewater systems typically require large effluent disposal areas which could require the removal of crops and other agricultural products in order to avoid potential contamination. However, with implementation of agricultural buffer requirements and other restrictions intended to improve compatibility between residential and agricultural uses, this impact would remain less than significant.

- **Reduced consistency with Agriculture Element (AE) and Conservation and Open Space Element (COSE) policies concerning the preservation of agricultural lands [AG-4].** This alternative is anticipated to result in similar development potential when compared to the Proposed Project; however, the smaller residential cluster parcels allowed under this alternative could reduce consistency with the following AE and COSE policies:

    - AE Policy 17: Agricultural buffers – This alternative would be in direct conflict with this policy since it could result in residential cluster parcels that are too small to accommodate the required agricultural buffers. As a result, agricultural buffers could be placed on the agricultural preserve parcel, rather than on individual residential cluster parcels. This could have the effect of burdening agriculturalists, rather than developers and homeowners, with the responsibility of establishing and maintaining the buffer area.

Visual Resources. This alternative is anticipated to result in similar development potential and overall site disturbance when compared to the Proposed Project. However, under this alternative, smaller residential cluster parcels could be created on agricultural land. Compared to the Proposed Project, this alternative would therefore be anticipated to change visual impacts as follows:

- **Increase impacts to the rural, agrarian character of the project area [VR-3].** By reducing the minimum parcel size for residential cluster parcels from 2.5 acres to 10,000 square feet, this alternative would extend urban-scale development patterns into undeveloped rural and agricultural areas. Such development would contrast with the rural, agrarian character of the project area.

Water Resources. This alternative is anticipated to result in similar development potential and overall site disturbance when compared to the Proposed Project, thereby resulting in similar impacts to constrained water basins. However, under this alternative, smaller residential cluster parcels could be created on agricultural land. These smaller parcels could require small community water systems. Compared to the Proposed Project, this alternative would therefore be anticipated to change impacts related to water resources as follows:

- **Reduced consistency with Agriculture Element (AE) Policy 11 and Conservation and Open Space Element (COSE) Policy WR 1.7 [WR-2].** This alternative would allow for small community water systems to be developed on agricultural parcels. Community water systems would compete directly with agricultural uses for groundwater. This alternative would therefore be anticipated to reduce consistency with AE Policy 11 and COSE Policy WR 1.7.

- **Reduced impacts to reliable water service [WR-3].** Under this alternative, small community water systems would continue to be allowed to serve residential cluster parcels. These water systems could be more reliable than individual on-site wells, thereby reducing impacts related to the reliability of water service. However, with implementation of existing ordinance standards and General Plan policies, this impact would remain insignificant.

Land Use Policy Consistency. This alternative is anticipated to result in similar development potential and overall site disturbance when compared to the Proposed Project. However, the smaller parcels allowed under this alternative could require the development of community water and wastewater systems, thereby increasing potential land use conflict with adjacent agricultural uses. Compared to the Proposed Project, this alternative would therefore be anticipated to change consistency with land use policy as follows:

- **Reduced consistency with Agriculture Element (AE) and Conservation and Open Space Element (COSE) policies concerning the preservation of agricultural lands.** This alternative is anticipated to result in similar development potential when compared to the Proposed Project; however, the smaller residential cluster parcels allowed under this alternative could increase reduce consistency with the following AE and COSE policies:

- AE Policy 11: Agricultural water supplies – This alternative would reduce consistency with this policy since it would allow for community water systems to be placed on agricultural parcels, resulting in direct competition between residences and agricultural uses for groundwater.

- AE Policy 17: Agricultural buffers – This alternative would reduce consistency with this policy since it could result in residential cluster parcels that are too small to accommodate the required agricultural buffers. As a result, agricultural buffers may be placed on the agricultural preserve parcel, rather than on individual residential cluster parcels. This could have the effect of burdening agriculturalists, rather than developers and homeowners, with the responsibility of establishing and maintaining the buffer area.

- **Reduced consistency with Conservation and Open Space Element policies concerning the sustainability of environmental resources.** This alternative is anticipated to result in similar development potential when compared to the Proposed Project; however, the smaller residential cluster parcels allowed under this alternative could result in increased impacts related to agricultural, visual, and water resources. Consequently, this alternative would be anticipated to reduce consistency with Conservation and Open Space Element policies concerning the sustainability of environmental resources.

No Substantial Change

Under this alternative, the minimum parcel size for residential cluster parcels in the inland area would be reduced from 2.5 acres to 10,000 square feet. Parcels sized less than 2.5 acres would be required to be served by community water and wastewater systems. Compared to the Proposed Project, this alternative would retain the same restrictive provisions and would be anticipated to result in similar development potential as the Proposed Project. Consequently, the impacts associated with Alternative 3 would be equivalent to the Proposed Project for the following subject areas:

- Air Quality
- Biological Resources
- Cultural Resources
- Geologic Hazards
- Greenhouse Gas
- Hydrology and Water Quality
- Noise
- Public Services and Utilities
- Traffic
- Growth Inducing

This alternative would be anticipated to result in the same number of potential new residences in agricultural areas of the county as the Proposed Project. Therefore, in all subject areas where impacts are correlated with anticipated development potential, this alternative would be result in similar impacts as the Proposed Project. Impacts are therefore anticipated to be equivalent in the areas of air quality, greenhouse gas emissions, noise, traffic, public services and utilities, and growth inducing effects. Furthermore, under this alternative, cluster development could occur in the same areas of the county and would result in similar amounts of site disturbance as the Proposed Project. Therefore, impacts would also be equivalent to the Proposed Project in

subject areas where potential impacts are correlated with anticipated amounts of site disturbance, such as: biological resources, cultural resources, geologic hazards, hydrology and water quality, and farmland conversion.

6.3.2 Conclusions

Reducing the minimum size for residential cluster parcels (Alternative 3) would result in similar development potential and overall site disturbance as the Proposed Project. Consequently, this alternative would be anticipated to have comparable impacts as the Proposed Project in the following subject areas: biological resources, cultural resources, geologic hazards, greenhouse gas emissions, hydrology and water quality, noise, traffic, and growth inducing effects. However, by reducing the minimum parcel size from 2.5 acres to 10,000 square feet, this alternative could extend urban-scale development patterns and community services into rural areas of the county. This could result in additional land use conflicts and increased impacts in the following subject areas: agriculture, public services/utilities, visual resources, water resources, and land use consistency. Based upon this analysis, the following conclusions have been reached:

- **This alternative is consistent with the project objectives.** This alternative meets the objectives of the project. Based on direction from the Board of Supervisors (February 17, 2009), this project is intended to reduce environmental impacts associated with the existing agricultural cluster subdivision ordinance. Additionally, this project is intended to improve access to existing infrastructure and services and align existing agricultural clustering standards with Strategic Growth principles. Compared to the existing ordinance, which allows for agricultural cluster subdivisions in most rural/agricultural areas of the inland area, this alternative would retain the requirement to limit agricultural cluster subdivisions to locations within five miles of established URLs, and would retain the proposed restrictive provisions. Consequently, this alternative would reduce the environmental impacts associated with existing policy and would improve consistency with Strategic Growth principles when compared to existing policy.

- **This alternative will not avoid any significant impacts associated with the Proposed Project.** Significant and unavoidable environmental effects (Class I impacts) are anticipated to result from the Proposed Project. These effects pertain to agricultural resources, air quality, greenhouse gas emissions, noise, and water resources (cumulative). This alternative would not avoid any of these identified significant and unavoidable impacts. This alternative is anticipated to reduce impacts related to the reliability of residential water service; however, this impact is already considered less than significant under the Proposed Project.

- **This alternative is anticipated to increase environmental impacts when compared with the Proposed Project.** This alternative is anticipated to increase environmental impacts related to: land use conflicts between residential and agricultural uses; consistency with the Agriculture Element of the General Plan; health hazards and water quality impacts related to small community water and wastewater systems on agricultural land; visual impacts; and land use policy consistency.

6.4 ALTERNATIVE 4: REDUCING RESIDENTIAL DENSITY ON EXISTING AGRICULTURAL PARCELS

Description

The objective of this alternative is to establish the same residential density standards for agricultural parcels in the inland portion of the county as those which currently apply in the Coastal Zone. This alternative assumes that the proposed Agricultural Cluster Subdivision Program will be implemented as proposed; however, this alternative also assumes that Agriculture Element Policy 5 and Section 22.30.480 of the Land Use Ordinance would be modified to allow only one, rather than two, single family residences per parcel in the Agriculture land use category. Provisions allowing additional residences to be constructed as farm support quarters would remain unchanged. This alternative would extend the same residential density standards that currently exist in the Coastal Zone to also apply in the inland portion of the county. Therefore, this alternative would not affect the Agricultural Cluster Subdivision Program in the Coastal Zone.

This alternative would result in the same number of new agricultural cluster parcels as the Proposed Project. However, this alternative would also eliminate the potential for a second primary residence on standard Agriculture parcels of 20 acres or larger. Historic trends demonstrate that roughly 8 percent of these parcels have actually exercised the ability to construct a second primary residence. Assuming this trend continues, Alternative 4 could reduce development potential by between 232 and 266 residences at General Plan build-out (see Table 6.4-1). Existing second primary residences would not be affected by this alternative.

Table 6.4-1: Subdivision and Development Potential under Alternative 4

Scenario	Feature	Project	Alternative 4	Change
Scenario 1: 100 % Cluster Subdivisions	Cluster Parcels/Residences	418	418	
	Standard Parcels	2,902	***2,902***	
	Standard Residences[8]	3,134		
	Total Residences	3,552	3,320	- 232 SFRs
Scenario 2: 100 % Standard Subdivisions	Cluster Parcels/Residences	0	0	
	Standard Parcels	3,320	***3,320***	
	Standard Residences	3,586		
	Total Residences	3,586	3,320	-266 SFRs
Scenario 3: Likely Build-out (65% Cluster / 35% Standard)	Cluster Parcels/Residences	272	272	
	Standard Parcels	3,048	***3,048***	
	Standard Residences	3,292		
	Total Residences	3,564	3,320	-244 SFRs

Achievement of Objectives

[8] For Proposed Project, calculations for standard residences assume continuation of the historic trend that roughly 8 percent of Agriculture-designated parcels have a second primary residential unit. Under Alternative 4, however, only one primary residence would be allowed on each of these parcels.

Objective	Complies?	Discussion
Improve access to existing infrastructure and services. Locate agricultural cluster subdivisions near existing infrastructure.	Yes	Under this alternative, cluster development would be located in closer proximity to existing infrastructure compared to the existing ordinance which allows cluster development in more remote areas of the county. This alternative would also reduce the number of primary residences that could be developed on standard parcels in more remote agricultural areas.
Implement Strategic Growth policies. Align the agricultural cluster ordinance standards with the County's adopted Strategic Growth policies of the County Land Use Element, which encourage development to be located within existing urban areas with adequate infrastructure and resources to accommodate future population growth.	Yes	This alternative would restrict cluster subdivisions to locations within five miles of identified URLs and reduce residential density on existing standard agricultural parcels, consistent with the intent of the County's Strategic Growth policies.
Introduce program to the Coastal Zone. Introduce the agricultural cluster subdivision program to the Coastal Zone to allow the reconfiguration of existing legal underlying lots into residential cluster parcels.	Yes	This alternative would introduce agricultural clustering provisions into the Coastal Zone Land Use Ordinance.
Accommodate cluster development. Accommodate agricultural cluster subdivisions through clustering of small, self-sustaining parcels near existing infrastructure and away from remote agricultural lands.	Yes	This alternative would allow for the creation of residential cluster lots on agricultural land within five miles of the identified URLs.
Avoid creation of new land use conflicts. Minimize land use conflicts between residential development and existing and future agricultural operations.	Yes	This alternative would include restrictive provisions intended to avoid agricultural/residential land use conflicts, and would reduce residential development on agricultural lands.
Protect important farmland. Reduce the amount of important farmland potentially converted to residential and non-agricultural uses in the Agriculture land use category.	Yes	This alternative would restrict residential development from occurring on prime agricultural soils and would limit residential development to no more than five percent of an agricultural property.

6.4.1 Impact Analysis

This alternative would result in the same development potential for agricultural cluster subdivisions as the Proposed Project (up to 418 new cluster parcels) and would therefore lead to the same physical changes compared to existing baseline conditions. For example, this alternative could still result in between 1,045 and 2,090 acres of site disturbance for the construction of 418 new single family residences and would therefore have the same impacts on agricultural, biological, and cultural resources within the project area. However, by reducing the number of single family residences that could be developed on standard agricultural parcels, this alternative would partially offset the significant environmental effects of the proposed ordinance amendments. For example, while this alternative would continue to allow for the conversion of between 1,045 and 2,090 acres of important farmland for the development of up to 418 new single family residences, it would partially offset this impact by limiting the amount of farmland that could be converted to residential uses on standard agricultural parcels. Likewise, construction and operational phase emissions resulting from the program would be offset under this alternative since fewer second primary residences would be constructed in remote agricultural areas of the county.

6.4.2 Conclusions

This alternative would be anticipated to result in the same number of potential new residences in agricultural areas of the county as the Proposed Project. Consequently, this alternative would be anticipated to have comparable impacts as the Proposed Project in the following subject areas: air quality, greenhouse gas, noise, public services/utilities, traffic, and growth inducing impacts. Furthermore, under both the Proposed Project and Alternative 4, existing ordinance requirements would reduce impacts related to geologic hazards and hydrology and water quality to less than significant levels; impacts in these areas would therefore not change under this alternative.

The alternative assumes that the ordinance requirements governing standard agricultural subdivisions would be modified to include additional restrictions mirroring those applied to agricultural cluster subdivisions. Although these additional restrictions would not reduce the environmental effects of the Agricultural Cluster Subdivision Program itself, they would have the effect of offsetting impacts associated with anticipated development under the program. Based on this analysis, the following conclusions are reached:

- **This alternative is consistent with the project objectives.** This alternative meets the objectives of the project. Based on direction from the Board of Supervisors (February 17, 2009), this project is intended to reduce environmental impacts associated with the existing agricultural cluster subdivision ordinance. Additionally, this project is intended to improve access to existing infrastructure and align existing agricultural clustering standards with Strategic Growth principles. This alternative would retain the requirement to limit agricultural cluster subdivisions to locations within five miles of the identified URLs as well as the proposed restrictive provisions. Consequently, this alternative would reduce the environmental impacts associated with existing policy and

would improve consistency with Strategic Growth principles when compared to existing policy.

- **This alternative is anticipated to offset the project's impacts.** Significant and unavoidable environmental effects (Class I impacts) are anticipated to result from the Proposed Project. These effects pertain to agricultural resources, air quality, greenhouse gas emissions, and noise. This alternative would continue to allow the construction of up to 418 new residential cluster parcels in rural/agricultural areas of the county, and would therefore be anticipated to result in the same changes to existing environmental conditions. As a result, this alternative would not avoid any significant impacts associated with the Proposed Project. Nevertheless, the additional ordinance amendments proposed under this alternative could have the effect of offsetting the significant impacts of the Proposed Project. For example, based on the anticipated development potential of up to 418 new residences, the Proposed Project is anticipated to result in significant and unavoidable impacts related to greenhouse emissions; Alternative 4 would result in the same number of new residences, but the greenhouse gas emissions generated from these residences could be offset by the additional reduction in units (up to 266) that could result from limiting density on existing agricultural parcels.

6.5 ALTERNATIVE 5: BASING DENSITY ON UNDERLYING PARCELS IN THE INLAND PORTION OF THE COUNTY

Description

The objective of this alternative is to establish the same methodology for determining the base density of agricultural cluster subdivisions in the inland portion of the county as proposed in the Coastal Zone. This alternative assumes that the proposed Agricultural Cluster Subdivision Program will be implemented as proposed; however, this alternative also assumes that the number of residential parcels that could be created would be equal to the number of existing underlying parcels. Under this alternative, no new parcels could be created, but existing parcels could be reconfigured to accommodate residential development.

Compared to the Proposed Project, this alternative would eliminate the potential for 418 new residential cluster parcels in rural/agricultural areas of the county. This alternative would also enable the reconfiguration of existing lots to allow residential development while minimizing environmental impacts. For example, under this alternative, an existing lot located entirely on steep slopes could be reconfigured to a more level area where development would be less visible and would result in fewer impacts related to drainage and erosion; meanwhile, the environmentally sensitive portions of the site would be protected under an agricultural preservation easement.

Although this alternative would not allow for the creation of new parcels, it would enable the reconfiguration of existing parcels to better accommodate residential development. For example, under this alternative, an existing underlying parcel that is currently undevelopable due to its shape or size could be reconfigured into a 2.5-acre residential cluster parcel and developed with a new single family residence. It would be speculative to estimate the number of existing lots that would be reconfigured under this alternative; however, under a reasonable worst case scenario, the following analysis assumes that the development potential under this alternative would equal that of the Proposed Project.

Achievement of Objectives

Objective	Complies?	Discussion
Improve access to existing infrastructure and services. Locate agricultural cluster subdivisions near existing infrastructure and services.	Yes	Under this alternative, cluster development would be located in closer proximity to existing infrastructure and services compared to the existing ordinance which allows cluster development in more remote areas of the county.
Implement Strategic Growth policies. Align the agricultural cluster ordinance standards with the County's adopted Strategic Growth policies of the County Land Use Element, which encourage development to be located within existing urban areas with adequate infrastructure and resources to accommodate future population growth.	Yes	Compared to the existing ordinance, this alternative would substantially reduce the potential for new agricultural cluster parcels in rural/agricultural areas of the county. Additionally, this alternative would retain the proposed restrictive provisions that are intended to avoid impacts to sensitive environmental resources.
Introduce program to the Coastal Zone. Introduce the agricultural cluster subdivision program to the Coastal Zone to allow the reconfiguration of existing legal underlying lots into residential cluster parcels.	Yes	This alternative would introduce agricultural clustering provisions into the Coastal Zone Land Use Ordinance.
Accommodate cluster development. Accommodate agricultural cluster subdivisions through clustering of small, self-sustaining parcels near existing infrastructure and away from remote agricultural lands.	Yes	This alternative would allow for the reconfiguration of existing underlying parcels into smaller residential size parcels, and would retain all of the proposed development standards, including the requirement to provide on-site wells and septic systems.
Avoid creation of new land use conflicts. Minimize land use conflicts between residential development and existing and future agricultural operations.	Yes	This alternative would reduce the potential for residential development in agricultural areas, and would retain all of the proposed development standards that are intended to minimize land use conflicts between residential development and agricultural operations.
Protect important farmland. Reduce the amount of important farmland potentially converted to residential and non-agricultural uses in the Agriculture land use category.	Yes	This alternative would restrict residential development from occurring on prime agricultural soils and would limit residential development to no more than five percent of an agricultural property.

6.5.1 Impact Analysis

Substantial Change

The following impacts are anticipated to be substantially different when contrasting Alternative 4 and the Proposed Project:

Biological Resources. This alternative is anticipated to have similar development potential as the Proposed Project; however, it would also enable the reconfiguration of existing underlying lots to allow for residential development while avoiding or reducing impacts on biological resources. Compared to the Proposed Project, this alternative would therefore change impacts to biological resources as follows:

- **Reduced impacts to sensitive habitats [BR-1], special status species [BR-2], and wildlife movement corridors [BR-3].** Compared to the Proposed Project, this alternative would be anticipated to result in a similar level of new residential development due to the reconfiguration of existing underlying lots to allow residential development. As a result, this alternative would have similar impacts on sensitive habitats, special status species, and wildlife movement corridors. However, this alternative would also allow for the reconfiguration of existing underlying lots in such a way to avoid or minimize impacts to sensitive biological resources. For example, there are existing underlying lots in the county that are located within riparian zones, wetlands, or other sensitive habitat areas. Development of these lots in their current configuration could result in significant impacts to sensitive habitat and special status plant and wildlife species. In some cases, these lots could even be developed with only a building permit and therefore would not be subject to environmental review under CEQA. In such a case, the project's biological impacts may go unmitigated.[9] In other cases, development of these lots may be subject to CEQA, but since avoiding the resource would not be a feasible option, mitigation would be off-site or compensatory. Under Alternative 5, a property owner would also have the option of reconfiguring the existing underlying lot into a 2.5 – 5 acre residential cluster parcel, which could be sited and designed to avoid biological resources.

Cultural Resources. This alternative is anticipated to have similar development potential as the Proposed Project; however, it would also provide a mechanism for reconfiguring existing underlying lots to allow for residential development while avoiding or reducing impacts on cultural resources. Compared to the Proposed Project, this alternative would therefore change impacts to cultural resources as follows:

- **Reduced impacts to historic resources [CR-1], pre-historic archaeological resources [CR-2], and paleontological resources [CR-3].** Compared to the Proposed Project, this alternative would be anticipated to result in a similar level of new residential development. As a result, this alternative would have similar impacts on cultural

[9] Mitigation could still be required as a condition of state or federal permits required by resource protection agencies.

resources. However, this alternative would also allow for the reconfiguration of existing underlying lots to allow residential development while avoiding areas with known archaeological and/or paleontological resources.

Geologic Hazards. This alternative is anticipated to have similar development potential as the Proposed Project; however, it would also provide a mechanism for reconfiguring existing underlying lots to allow for residential development while reducing the potential for geologic hazards. Compared to the Proposed Project, this alternative would therefore change impacts to geologic hazards as follows:

- **Reduced impacts resulting from residential development near fault lines [G-1], and in areas with soil hazards [G-2].** Compared to the Proposed Project, this alternative would be anticipated to result in a similar amount of site disturbance for new residential development. As a result, there would be a similar potential for development to occur in areas with active or potentially active faults and in areas with soil hazards. However, this alternative would also allow for the reconfiguration of existing underlying lots to allow residential development while reducing the potential for geologic hazards. For example, under this alternative, underlying lots in the county which are located on steep slopes could be reconfigured to more level areas, where less soil hazards exist.

Hydrology and Water Quality. This alternative is anticipated to have similar development potential as the Proposed Project; however, it would also enable the reconfiguration of existing underlying lots to accommodate the construction of new residences in areas where existing site conditions, such as topography, are more suitable for residential development. Compared to the Proposed Project, this alternative would therefore change impacts to hydrology and water quality as follows:

- **Reduced impacts from alteration of drainage courses [HWQ-1], and alteration of drainage conditions [HWQ-2].** Compared to the Proposed Project, this alternative would be anticipated to result in a similar amount of site disturbance for new residential development. As a result, this alternative would have similar impacts relative to the alteration of drainage courses and drainage conditions. However, this alternative would also allow for the reconfiguration of existing underlying lots to allow residential development in areas where existing site conditions are more suitable for residential development, thereby reducing potential alteration of drainage conditions.

- **Reduced erosion and sedimentation impacts [HWQ-3].** Compared to the Proposed Project, this alternative would be anticipated to result in a similar amount of site disturbance for new residential development. However, this alternative would also allow the reconfiguration of existing underlying lots to allow residential development in areas where existing site conditions are more suitable for residential development, thereby reducing potential sedimentation and erosion impacts.

- **Reduced development in flood hazard areas [HWQ-4].** Compared to the Proposed Project, this alternative would be anticipated to result in a similar amount of site

disturbance for new residential development. However, this alternative would also enable the reconfiguration of existing underlying lots to avoid areas with flood hazards.

- **Reduced discharge of stormwater and non-stormwater pollutants [HWQ-5].** Compared to the Proposed Project, this alternative would be anticipated to result in a similar amount of site disturbance for new residential development. However, this alternative would also enable the reconfiguration of existing underlying lots to allow for the construction of residences in areas where existing site conditions are more suitable for development, thereby reducing potential impacts related to the discharge of pollutants.

Visual Resources. This alternative is anticipated to have similar development potential as the Proposed Project; however, it would also enable the reconfiguration of existing underlying lots to accommodate the construction of new residences in areas where existing site conditions, such as topography, are more suitable for residential development. Compared to the Proposed Project, this alternative would therefore change visual impacts as follows:

- **Reduced impacts on scenic vistas [VR-1], viewsheds from state scenic highways [VR-2], and the rural, agrarian character of the project area [VR-3].** Compared to the Proposed Project, this alternative would be anticipated to result in a similar amount of development in visually sensitive areas. However, this alternative would also enable the reconfiguration of existing underlying lots to allow the construction of residences in areas where development would be visible from public viewing areas. Therefore, impacts to visual resources would be reduced under this alternative.

No Substantial Change

This alternative assumes that the proposed Agricultural Cluster Subdivision Program will be implemented as proposed; however, this alternative also assumes that the number of residential parcels that can be created would be equal to the number of underlying parcels (inland portion of the County). This alternative would retain the restrictive provisions under the proposed program and would be anticipated to result in similar development potential. Consequently, the impacts associated with Alternative 5 would be equivalent to the Proposed Project for the following subject areas:

- Agricultural Resources
- Air Quality
- Greenhouse Gas
- Noise
- Public Services/Utilities
- Traffic
- Water Resources
- Growth Inducing
- Land Use Policy Consistency

6.5.2 Conclusions

This alternative would result in similar development potential as the Proposed Project, and would therefore result in similar impacts as the Proposed Project in the following subject areas: agricultural resources, air quality, greenhouse gas, noise, public services/utilities, traffic, water

resources, growth inducing impacts, and land use policy consistency. However, this alternative would also enable the reconfiguration of existing underlying lots to allow for the construction of residences in areas where existing site conditions are more suitable for development. As a result, this alternative would reduce potential impacts related to: biological resources, cultural resources, geologic hazards, hydrology and water quality, and visual resources. Based upon this analysis, the following conclusions have been reached:

- **This alternative is consistent with the project objectives.** This alternative meets the objectives of the project. Based on direction from the Board of Supervisors (February 17, 2009), this project is intended to reduce environmental impacts associated with the existing agricultural cluster subdivision program. Additionally, this project is intended to locate cluster development closer to existing infrastructure and services and to align existing agricultural clustering standards with Strategic Growth principles. This alternative would retain the requirement to limit agricultural cluster subdivisions to locations within five miles of identified URLs as well as the proposed restrictive standards. Consequently, this alternative would reduce the environmental impacts associated with existing policy and would improve consistency with Strategic Growth principles when compared to existing policy.

- **This alternative will not avoid any significant impacts associated with the Proposed Project.** Significant and unavoidable environmental effects (Class I impacts) are anticipated to result from the Proposed Project. These effects pertain to agricultural resources, air quality, greenhouse gas emissions, traffic, and water resources (cumulative). This alternative would reduce the severity of impacts related to agricultural resources, biological resources, and water resources; however, under this alternative, these impacts would remain significant and unavoidable.

- **This alternative is anticipated to reduce environmental impacts when compared with the Proposed Project.** This alternative would reduce potential impacts related to: biological resources, cultural resources, geologic hazards, hydrology and water quality, and visual resources. Nonetheless, since these impacts would only be reduced in a limited number of circumstances, this alternative wouldn't reduce the level of impacts for these subject areas.

6.6 COMPARISON OF ALTERNATIVES

6.6.1 Summary

The following alternatives are anticipated to reduce environmental impacts when compared to the Proposed Project:

- **Alternative 2(a) and 2(b): Changing Locational Criteria (Inland).** The objective of this alternative is to locate agricultural cluster development in closer proximity to existing infrastructure and services compared to what is allowed under the Proposed Project. Under this alternative, agricultural cluster subdivisions would be located within two, rather than five, miles from the identified URLs. When compared to the Proposed Project, this alternative would result in an approximately 50 percent reduction in potential site disturbance. Consequently, this alternative would reduce environmental impacts in all subject areas.

- **Alternative 4: Reducing Residential Density on Existing Agricultural Parcels.** The objective of this alternative is to establish the same residential density standards that currently exist in the Coastal Zone to also apply in the inland area. This alternative assumes that Agriculture Element Policy 5 (AGP5) and Section 22.30.480 of the Land Use Ordinance would be modified to allow only one, rather than two, single family residences per existing parcel in the Agriculture land use category. Assuming the continuation of historic development trends, this alternative would reduce development potential on agricultural land by 266 residential units. This reduction in development potential would partially offset the anticipated impacts of the Agricultural Cluster Subdivision Program. However, under this alternative, the program would be implemented as proposed. Therefore, compared to the CEQA baseline (existing physical conditions), this alternative would lead to the same amount of development and the same environmental impacts as the Proposed Project.

- **Alternative 5: Basing Density on the Number of Existing Underlying Parcels in the Inland Portion of the County.** The objective of this alternative is to establish the same methodology for determining the base density of agricultural cluster subdivisions in the inland portion of the county as proposed in the Coastal Zone. This alternative assumes that the number of residential parcels that can be created would be equal to the number of existing underlying parcels. Under this alternative, no new parcels could be created, but existing parcels could be reconfigured. This alternative is expected to result in similar development potential as the Proposed Project, and, in some instances, could reduce environmental impacts associated with development on existing underlying parcels.

The following alternatives are anticipated to increase environmental impacts when compared to the Proposed Project:

- **Alternative 1: No Project**. This alternative was evaluated in order to comply with State CEQA Guidelines Section 15126.6. The "no project" alternative would allow the continuation of existing policies and ordinance standards governing agricultural cluster subdivisions. Compared to the Proposed Project, this alternative could result in up to 945 additional residences in rural/agricultural areas of the county. Consequently, this alternative would result in greater environmental impacts than the Proposed Project in virtually all subject areas. All identified Class I, *significant and unavoidable*, and Class II, *significant but mitigable*, impacts would be exacerbated under this alternative. The only impacts which are reduced under this alternative relate to viewsheds within the Coastal Zone, and reliability of domestic water systems. These reduced impacts, however, are already identified as Class III, *less than significant*, even under the Proposed Project, and fall below thresholds warranting mitigation.

- **Alternative 3: Reducing Minimum Parcel Size.** Under this alternative, the minimum parcel size for residential cluster parcels would be reduced from 2.5 acres to 10,000 square feet. The objective of this alternative is to reduce the footprint of residential cluster development on agricultural land; however, smaller parcels would not contain sufficient area to accommodate the required residential infrastructure and agricultural buffers on site. As a result, these non-agricultural uses would instead be established on the agricultural parcel. The overall footprint of residential and non-agricultural development on agricultural land would therefore be similar when comparing this alternative to the Proposed Project. As a result, this alternative would result in similar impacts to the Proposed Project in the following subject areas: biological resources, cultural resources, geologic hazards, greenhouse gas, hydrology and water quality, noise, traffic, growth inducing effects, and the conversion of prime farmland.

  This alternative would allow for the creation of parcels below the minimum size required for on-site wells and septic systems, and could therefore lead to the development of small community water and wastewater systems on agricultural properties. Additionally, this alternative would allow for the creation of residential cluster parcels that are too small to accommodate agricultural buffers on-site, as required by existing buffer policy. Visually, development on small residential parcels would conflict with the character of the rural area. Consequently, this alternative could increase impacts related to: agriculture, public services/utilities, visual resources, and land use consistency.

- **Alternative 2(c): Establishing Locational Criteria in the Coastal Zone.** The objective of this alternative is to locate agricultural cluster development in the Coastal Zone in closer to proximity to existing infrastructure consistent with the inland version of the proposed amendments. This alternative assumes that agricultural cluster subdivisions in the Coastal Zone will be located within two road miles of the following URLs: Cambria, Cayucos, Morro Bay, and Los Osos. This alternative would reduce the number of existing underlying parcels in the Coastal Zone which could participate in the program. As a result, a greater number of existing parcels would be developed in their current configuration with fewer restrictions than would be required under the proposed program. Therefore, this alternative would increase impacts in the following subject

areas: agricultural resources, biological resources, geologic hazards, hydrology and water quality, visual resources, water resources, and land use policy consistency.

6.6.2 Reduction of Significant Impacts

According to State CEQA Guidelines, the purpose of an alternatives analysis is to identify alternatives to the project that could reduce the project's significant environmental effects:

> *Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.*

As proposed, the Agricultural Cluster Subdivision Program is anticipated to result in significant and unavoidable environmental effects (Class I impacts) related to agricultural resources, air quality, greenhouse gas emissions, and noise. Alternative 2(a) and 2(b) (Modifying Locational Criteria in the Inland Area) would reduce impacts in virtually all subject areas. Alternative 4 (Reducing Residential Density) would partially offset, but not reduce, the project's significant effects. Alternative 5 (Basing Residential Density on Underlying Parcels) is anticipated to have similar impacts as the proposed project. Alternative 1 (No Project), Alternative 2(c) (Establishing Locational Criteria in the Coastal Zone) and Alternative 3 (Reducing Minimum Residential Parcel Size) would increase impacts in several subject areas.

Table 6.6-1: Reduction of Significant Impacts

Alternative	**Impact AG-1:** Conversion of Important Farmland	**Impact AQ-2:** Operational –phase Emissions	**Impact GHG-1:** Greenhouse Gas Emissions	**Impact N-2:** Noise affecting Existing Sensitive Receptors
Alternative 1: No Project				
Alternative 2(a): Modify Locational Criteria: Two Road Miles	●	●	●	●
Alternative 2(b): Modify Locational Criteria: Two Straight Miles	●	●	●	●
Alternative 2(c): Establish Locational Criteria in the Coastal Zone				
Alternative 3: Reduce the Minimum Residential Cluster Parcel Size				
Alternative 4: Reducing Residential Density on Standard Ag Parcels				
Alternative 5: Base Residential Density on Underlying Parcels				

6.6.3 Environmentally Superior Alternative

In this section, the County has identified the Environmentally Superior Alternative, as required by CEQA Guidelines Section 15126.6(d) and (e)(d). CEQA requires the following for alternatives analysis and comparison:

> *The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project. A matrix displaying the major characteristics and significant effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed. (State CEQA Guidelines Section 15126.6[d]).*

If the environmentally superior alternative is the "no project" alternative, CEQA requires the identification of an environmentally superior alternative among the other alternatives (*State CEQA Guidelines Section 15126.6[e][2]).*

Based on the analysis presented in this section and on the impact analysis for the Proposed Project presented in Section 4 of this EIR, **Alternative 2(a)** has been identified as the environmentally superior alternatives. This alternative would locate agricultural cluster projects within two road miles of the identified URLs in the inland portion of the county. In the Coastal Zone, agricultural cluster projects would not be subject to locational criteria. This alternative has been chosen because it would reduce the severity of all of the Proposed Project's significant and unavoidable impacts.

Table 6.6-2: Impact Comparison of Alternatives to Proposed Project

Subject Areas	**Proposed Project**	**Alternative 1:** No Project	**Alternative 2(a):** Two Road Mile URL Limitation	**Alternative 2(b):** Two Straight Mile URL Limitation	**Alternative 2(c):** Establishing Locational Criteria in CZ	**Alternative 3:** Reducing Residential Parcel Size	**Alternative 4:** Reducing Residential Density	**Alternative 5:** Basing Density on Underlying Lots
Agricultural Resources	=	+	-	-	+	+	=	=
Air Quality	=	+	-	-	=	=	=	=
Biological Resources	=	+	-	-	+	=	=	-
Cultural Resources	=	+	-	-	+	=	=	-
Geologic Hazards	=	+	-	-	+	=	=	-
Greenhouse Gases	=	+	-	-	=	=	=	=
Hydrology / Water Quality	=	+	-	-	+	=	=	-
Noise	=	+	-	-	=	=	=	=
Public Services / Utilities	=	+	-	-	=	=	=	=
Traffic	=	+	-	-	=	=	=	=
Visual Resources	=	+	-	-	+	+	=	-
Water Resources	=	+	-	-	+	-	=	=
Growth Inducing Impacts	=	+	-	-	=	=	=	=
Land Use Policy Consistency	=	+	-	-	+	+	=	-

+ = increases severity of impacts when compared to Proposed Project
- = reduces severity of impacts when compared to Proposed Project.